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ABSTRACT

The Center for Occupational Education sponsored a National Conference on Accreditation of Public Postsecondary Occupational Education, held in Atlanta, Georgia on June 10-12, 1970. The major papers presented at that conference were: (1) "The Continuing Need for Nongovernmental Accreditation" by Frank G. Dickey, (2) "Specialized Accrediting Agency Activities in Occupational Education" by Jerry W. Miller, (3) "The Role of the Accreditation and Institutional Eligibility Staff of the U.S. Office of Education in Accreditation of Postsecondary Occupational Education" by John R. Proffitt, (4) "An Analysis of Accreditation of Postsecondary Occupational Education in the U.S." by Charles F. Ward, (5) "Accreditation of Postsecondary Occupational Education: Issues and Alternatives" by William K. Selden, (6) "The American Vocational Association and the Development of Standards for Occupational Education" by Lane C. Ash, (7) "The Community Junior College Approach to Specialized Program Accreditation" by Kenneth G. Skaggs, and (8) "A Holistic Approach to Evaluating Occupational Education" by John K. Coster and Robert L. Morgan. (GEB)

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PERSPECTIVES ON ACCREDITATION OF POSTSECONDARY OCCUPATIONAL EDUCATION

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CENTER MONOGRAPH NO. 5

CENTER FOR OCCUPATIONAL EDUCATION
NORTH CAROLINA STATE UNIVERSITY AT RALEIGH
1970

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Center Monograph No. 5

Center for Occupational Education
North Carolina State University at Raleigh

1970

PREFACE

With the recently increased government emphasis on and public demand for occupational education has arisen an increased need for more reliable means of maintaining the quality of that education. More and different approaches to accreditation of occupational education are attempting to meet this need. There are as many different theories on the proper scope and authority of accreditation as there are accrediting agencies. The papers contained in this monograph, gleaned from the National Conference on Accreditation of Public Postsecondary Occupational Education, present the history, current state, and future possibilities of the accreditation of occupational education.

The Center for Occupational Education expresses its appreciation to the participants of the National Conference on Accreditation of Public Postsecondary Occupational Education for their presentations at that Conference and for permission to publish their papers in this monograph.

Special acknowledgement is due Dr. Charles F. Ward for his insight in conceiving and compiling this report.

Finally, the Center acknowledges the technical, clerical, and editorial assistance of its staff.

John K. Coster
Director

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INTRODUCTION

One of the more complex issues facing those responsible for postsecondary occupational education is that of accreditation. Some facets of the issue are: institutional accreditation versus programmatic accreditation; state accreditation versus extralegal or voluntary accreditation; the relationship of accreditation to licensure, certification and approval; the role of the federal government in accreditation; the applicability of present accreditation standards and techniques to occupational education; and, at the very base of the issue, the question of the need or desirability of accrediting occupational education. In the last decade the issue has been compounded because of the fact that Congress has, with increasing frequency, tied institutional eligibility for federal funds to the requirement that the recipient institution be accredited by an agency or association recognized by the United States Commissioner of Education as being a reliable authority on the quality of the institution or, as the case may be, a specific program within the institution. Thus, accreditation, which was initially conceived as a voluntary association of institutions, is no longer voluntary, and the extralegal associations now find themselves, by congressional fiat, performing a governmental function.

As one of its efforts to improve the evaluative process in occupational education, the Center for Occupational Education at North Carolina State University undertook a comprehensive study of the current state of accreditation and evaluation of postsecondary occupational education in the United States. As an outgrowth of this study, the Center sponsored a National Conference on Accreditation of Public Postsecondary Occupational Education, held in Atlanta, Georgia on June 10-12, 1970. The papers contained in this monograph are the major papers presented at that conference.

The papers published herein are not presented by the Center as definitive solutions to the issues set forth in the introductory paragraph. Rather, the papers are published to present the issues, alternatives, and solutions concerning accreditation as perceived by several different persons with diverse backgrounds, expertise, points of view and, yes, even biases. It is hoped that the information contained in the papers will serve to enlighten the reader concerning the issues and alternatives in accreditation of occupational education so that he may draw his own conclusions based upon a better understanding of the issues.

THE CONTINUING NEED FOR NONGOVERNMENTAL ACCREDITATION

Frank G. Dickey
Executive Director
National Commission on Accrediting
June 12, 1970

An audience as knowledgeable as this needs little schooling in the importance of the concept of accountability as it applies to educational quality. We are all well aware of the need and the right of the public to know something of the quality of our educational programs and institutions. We are accustomed to the legislative and Congressional practices of checking to see whether or not state and federal funds are being wisely and prudently expended. The individuals attending this conference are acquainted with the fact that the Unites States has approached this business of assessing the quality of educational programs and institutions in a manner unlike that used in any other nation of the world, namely, through nongovernmental accreditation. Other countries have their ministries of education and govern their institutions and regulate the quality of their schools on a national, governmental basis, but we in the United States, largely because of the construction of our Constitution, have turned to a different means of assessing and regulating, to a degree, the quality of our educational institutions and the programs making up these institutions.

Because we have no central ministry of education in the United States, and, therefore, have fifty different state approaches to education, the need has developed for identifying institutions which meet certain minimum standards of quality. This information is needed not only to enable students to transfer from one institution to another, but also to protect society as a whole.

While the role of the accrediting associations, whether they are general or specialized, is primarily that of maintaining and improving the quality of education, they do serve in another manner. I am speaking now of the point at which many legislators say, "They've quit preaching and gone to meddling," namely, in the area of protecting the freedom and integrity of the institutions of higher education. This is deemed necessary for the continuing quality of our institutions.

When we object to outside interference in the affairs of colleges or schools, we do not mean political interference only. Frequently, institutions are subjected to unusual or extraordinary pressures from local communities, citizens' groups, church groups, and even professional organizations. All accrediting organizations will always be concerned when institutional integrity and academic freedom are threatened by forces originating from any of these sources. It should be pointed out, however, that we are not trying to stifle the normal criticism or pressures brought to our schools and colleges. Many groups and organizations have the responsibility to make themselves heard in the affairs of the institutions with which they are concerned. This is as it should be. Such pressures are expected and are healthy as long as they are within the group's or organization's jurisdiction and do not clash with the stated purposes of an institution. However, interference in the affairs of an institution from any of these sources is an entirely different matter, and interference should not be confused with "normal interest or concern."

A few individuals, disenchanted with the inconsistencies, abuses, and problems of accreditation, have suggested that we do away with accrediting. I must admit that I have been sorely tempted when the frustrations grew great to make a similar suggestion. Then, suddenly, one is brought up short when one considers the alternatives. I say "alternatives," for we are deluding ourselves if we think for even one brief moment that a nation as sophisticated as ours is going to permit its vast educational system to operate without some form of assessment and evaluation. Before we speak of alternatives, however, let me indicate what I think is the proper relationship between the accrediting associations and the federal government.

The new realities of federal governmental participation in the development of the nation's system of postsecondary education demand new and realistic philosophical and psychological positions on the part of the accrediting organizations. Emerging from these stances will come new patterns of activity on the part of the accrediting bodies relative to the federal government.

The essential philosophical framework within which the associations might shape their relationships with the federal government could be characterized by the term "cooperative interaction." This term implies a recognition on our part that the federal government is now an indisputably dynamic participant in the process of shaping American higher education. It is recognized that since World War II the federal government--primarily through the Department of Health, Education, and Welfare--has expanded its support activities for education in an extraordinary fashion. Federal funding of education has become an integral part of our national social policy and, while this effort at the present time is largely on a programmatic basis insofar as the higher education segment is concerned, it may be reasonably expected that a federal "general support" funding program for higher education will materialize subsequent to the termination of the Vietnamese conflict.

I do not think we should view the federal government, in its expanding role of aiding higher education, as an antagonist, and I do not believe we should think of federal agencies as an inherent or necessary threat to the autonomy of higher education. The history of the federal government's relationships to the various policy-formulating institutions of our society presents a pattern of enhanced federal power wherever these other societal institutions (state governments, etc.) fail to react in a responsible manner to contemporary social pressures. If the policy organs of American higher education fail to master the challenge confronting them, they must inevitably accept the federal government as the dominant formulater of educational policy.

By shaping its policies and procedures in such a way as to meet the reflected demands of our society, accrediting associations should anticipate a process of "cooperative interaction" between the organizations and the federal government. In pursuit of this stated philosophy, I propose that we exercise active, vigorous leadership within our corporate spheres of responsibilities--and especially wherever our responsibilities and those of the federal government impinge. To that extent, compatible with the valid interests and claims of American higher education, the accrediting associations should function so as to inform, persuade, and enlighten the various agencies of the federal government regarding their perception of the best interests of the higher education community, and of society as a whole; the accrediting bodies should acquaint themselves with the federal policy-making process relative to higher education. Positively, the accrediting organizations should respond to the valid requests for action and leadership made upon them by the federal government. In so doing, the accrediting bodies might serve notice that they accept the federal government as a proper, creative participant in the effort toward elevating the quality of America's system of higher education--and a partner whose interests it will respect.

Under competent and benevolent administrations such an approach might not be too objectionable, but under some administrations with tendencies to load the offices with their own political cronies, I would have some real qualms. Furthermore, I have some grave doubts about the constitutionality of a federal system of accreditation, for the United States Constitution expressly leaves the matter of education untouched. Consequently, the entire jurisdiction of education becomes the responsibility of the fifty separate and sovereign states. This, then, brings us to the second alternative--state accreditation. There may be some among us today who would favor this approach, but I dare say that they take this position on the false assumption that all other states would accept their own state's particular accreditation decisions and would not question their authority. Once more, I think I have had just enough experience with state governments to be able to assure you that anyone who thinks fifty different systems of accrediting would not be pure chaos is living in a fool's paradise.

I have developed a new law which may not be the equivalent of Gresham's Law or Boyle's Law, but I feel that it has considerable applicability today. That law is, "Stupid people make stupid decisions."

Obviously, I am trying to make a point that will justify the title of my remarks. There is a continuing need for nongovernmental accreditation. In spite of its present faults, abuses, and problems, it still represents the best and most efficient method we have for assessing the quality of education and indicating this quality to all of those concerned with education--the students, parents, citizens, legislators, foundations, and all other interested groups.

I believe in the concept of nongovernmental accreditation!

Having said this, however, let me say that I do not believe accreditation as currently operating is giving emphasis to the essential elements in our educational endeavors. Too frequently, in our attempt to conform to measurable "standards," we have given emphasis to the peripheral aspects of the institution and have missed the essential factors in an educational undertaking.

Two major elements should serve as the heart of real accreditation. The first of these is the teacher, and the second is the manner in which the learning process is being carried on.

It seems to me that we have the capacity to determine the qualitative components in a teacher in spite of the difficulties such a task presents. Is all of our knowledge of human behavior and human predictability of no avail when we are faced with the most important use that could be made of it? Should we be content merely with the fulfillment of the technical requirements? Are we going to continue to count the number of Ph.D.'s as an indication of excellence in teaching? Could we not rather search in each institution for signs of great teaching, for proof that the interaction of teacher and student so essential to learning is actually taking place? Of much greater importance than the degree held would seem to be the methods by which an institution finds and selects its instructional staff and the faculty pattern it creates as a result of conscious efforts to build a great teaching center.

The second major concern of accreditation must be the learning process itself. Too many accrediting groups are concerning themselves with the number of courses given in a specific field. Would it not be more practical to place the accrediting emphasis on the evidence of creative teaching and the ability of the institution to turn out students who are intellectually curious and have a world-encompassing social consciousness for the rest of their lives?

Attention to these two essential emphases in accrediting will call for a change in both standards and procedures. We shall need to spend much more time visiting in the classroom than in conferences with committees. We shall need to visit more with students in their informal surroundings than in structured sessions planned by the institution itself. As anti-establishment as it may sound, would it not be more productive to eavesdrop on conversations of faculty than to weigh the poundage of their research papers?

Obviously, these suggestions would call for far more subjective judgments and might result in less satisfying or less conclusive results, but sometimes a little disorder can exert a benign influence.

Let me urge that we keep in mind the real purposes of accreditation, and let us be certain that these purposes relate to the humane aspects of learning and not to the mechanical trappings of the organization. Let us center our attention on the teacher and what happens to the student, for they are the only real hope for educational advance.

My belief is that there is no agency or group better able to assist in upgrading the quality of our educational institutions and protecting the integrity of these colleges and universities than the accrediting associations. These are not agencies operated by one man, by a small clique, by one party, or by one denomination. They are large, broadly based operations depending upon the principles of self-regulation and self-control reflected through cooperatively devised standards arrived at by the consent of all the constituent organizations. These, I believe, can be depended upon to preserve education as an essential force in a society of free man. Again, I remind you that these criteria are not the reflection of one institution which may occasionally go astray, but rather the combined thinking of all of our best institutions. When we can no longer depend upon the judgments and deliberations of the combination of our educational institutions, I fear that the end may be closer than we think.

With both public and independent school forces of every level joining hands, I believe that we can keep accrediting positive, constructive, and socially useful--that is, as long as we have the courage, the faith, and the foresight to impose upon ourselves and our institutions a real zeal for self-discipline and as long as we demonstrate a high devotion to quality in our educational programs.

SPECIALIZED ACCREDITING AGENCY ACTIVITIES IN OCCUPATIONAL EDUCATION

Jerry W. Miller, Associate Director
National Commission on Accrediting
Washington, D. C.

In keeping with the focus of this conference, this paper will be limited to a discussion of the role of specialized accreditation in public postsecondary occupational education. The term occupational education will be restricted to mean educational programs intended primarily to lead to employment. The credential awarded upon completion might be a certificate, diploma, or associate degree, but in no case would the credential carry higher status than that normally assigned to the associate degree.

A brief overview of specialized accreditation activities in occupational education within the above limitations will be presented along with a rationale for this type of accreditation. This will be followed by a brief discussion of current problems and those which probably lie ahead. To illustrate, reference will be made to an impending study of accreditation for allied health education.

Specialized Accreditation in Occupational Education

The National Commission on Accrediting recognizes agencies to accredit in five specialized fields at the associate degree level: The Council on Dental Education of the American Dental Association--programs in dental assisting, dental technology, and dental hygiene; Engineers' Council for Professional Development--two-year programs of engineering technology; and the National League for Nursing--technical nurse or associate degree nursing programs.

The U. S. Commissioner of Education also awards recognition to accrediting agencies meeting certain criteria. Those recognized to accredit programs of occupational education in the public sector include the Council on Medical Education of the American Medical Association--programs in medical record technology and radiologic technology; the National League for Nursing and the National Association for Practical Nurse Education and Service, Inc.--practical nurse programs; the Accrediting Bureau for Medical Laboratory Schools--medical laboratory technician education; and the Council on Dental Education of the American Dental Association--programs in dental hygiene, dental assisting, and dental technology. All the above agencies except NAPNES, ECPD, and the Accrediting Bureau for Medical Laboratory Schools, have limited their activities to nonprofit education institutions. In some cases, such as the ECPD, NAPNES, and the Accrediting Bureau, these agencies become institutional accrediting agencies when they accredit single-purpose institutions.

To keep the accreditation of occupational education in some perspective, it should be mentioned here that the U. S. Commissioner of Education recognizes the following as specialized accrediting agencies for private nonprofit and proprietary occupational education institutions: the Accrediting Commission for Business Schools, the National Association of Trade and Technical Schools, the Cosmetology Accrediting Commission, and the National Home Study Council.

The National Commission on Accrediting recognizes only those agencies which accredit occupational programs in junior and community colleges and technical institutes which are eligible for membership in the American Association of Junior Colleges. Agencies recognized by the U. S. Commissioner of Education, on the other hand, may accredit programs in postsecondary institutions, including area vocational schools or industrial education centers that do not fall into the traditional collegiate institution category.

The Council on Medical Education of the American Medical Association does accredit other programs of an occupational nature in allied health education without the specific approval of the National Commission on Accrediting or the U. S. Office of Education. The Board of Commissioners of the National Commission deferred action on an AMA request for recognition in 11 new fields, mostly at the associate degree or lower levels, at its last annual meeting. The U. S. Office of Education has also deferred action on a request by AMA for recognition in several new fields. Both the U.S.O.E. and the National Commission deferred action mainly because of the impending study of accreditation in allied health education, which will be mentioned in more detail later.

The Demand for Specialized Accreditation

All are familiar with the fact that America has generally adopted the concept of laissez-faire, which opposes governmental interference in economic affairs beyond the minimum necessary for the maintenance of peace and property rights. That doctrine, adapted and restated, accurately conveys the feelings of most educational administrators relative to their institutions and accrediting agencies:

> As a group, educational administrators in the United States favor evaluation of their institutions by outside agencies only to the extent necessary to maintain public confidence in the institution's quality and integrity.

This feeling derives from a basic belief in American education. This belief is well stated in the preamble to the Charter and Bylaws of the National Commission on Accrediting:

> The overall strength of the entire system of education derives in large part from the unique and diversified contributions of the individual institutions. This strength can be maintained and

extended only if the institutions are free to experiment in the ways and means of education, and to determine their own objectives. They must be free to exercise both responsibility and authority in administering their programs.

It is obvious, however, that this freedom cannot be a blank check. The educational establishment 75 years ago came to the realization that some means of quality control in educational matters was essential to the general welfare of education institutions. That widely-accepted principle is, however, about the only statement relative to accreditation with which some part of the membership of today's educational establishment is not apt to take issue. In the matters of who accredits what for what purpose, the depth of evaluation, involvement in accreditation policy-making, institutional prerogatives in the accreditation process, and the appropriate amount of muscle to be applied by accrediting agencies in seeking conformity to standards and procedures, a lot of conversation in accreditation is generated. These areas give rise to pressures for specialized accreditation.

We think mainly of specialized or programmatic accreditation as being superimposed over the institutional accreditation process and as being a necessary addition in certain fields to help protect society from ill-prepared or incompetent practitioners. Some view specialized accreditation as unwarranted duplication, holding that the institutional process is adequate to assure quality in each educational program within an institution. Still others hold the institutional process to be inadequate and argue for program-by-program approval. This latter argument is heard particularly in some quarters of occupational education.

There are inherent and potential conflicts between specialized and institutional accreditation. The very need, as a matter of fact, for specialized accreditation says a great deal about the limitations of the institutional process. In complex institutions with a number of specialized programs, the institutional process is incapable of the in-depth evaluation necessary to assure society of competence in such essential fields as medicine, dentistry, law, engineering, etc.

It is in such fields that the educational establishment has come to realize that a more narrow and in-depth professional focus and expertise are essential in the evaluation and accreditation process--a professional focus and expertise not organizationally possible in an agency faced with the awesome responsibility of accrediting institutions that range from technical institutes to liberal arts college huge institutions with a primary emphasis on research and graduate education.

Potential conflicts between specialized and institutional accreditation will always exist. Specialized agencies are prone to stray over into areas which are properly the concern of institution-wide policy, and great care must always be taken not to create conflicts in the application of varying sets of standards to the same institution.

This potential for conflict in no way negates the need for both institutional and specialized approaches to accreditation. The policy statement of the Federation of Regional Accrediting Commissions of Higher Education, while making an attempt to distinguish between objectives and purposes of institutional accreditation vs. specialized accreditation, gives recognition to this important point:

> "...general accreditation of the institution as a whole is not and should not be interpreted as being equivalent to specialized accreditation of each of the several parts or programs of the institution."

Later, the statement amplified the point in this manner:

> Institutions must not "...interpret...general accreditation as validating a specialized program in the same manner and to the same extent as specialized accreditation."

The Federation statement gives recognition to the social need for both institutional and specialized accreditation.

On the other hand, social good is not always served by specialized accreditation, and it was the recognition of this fact that led to the creation of the National Commission on Accrediting more than 20 years ago. Essentially, it is the role of the National Commission to make decisions which balance the need for professional and specialized accreditation with that of the general welfare of educational institutions. The larger context in which these decisions are made is that of social good. The National Commission supports institutional accreditation and holds that wherever social need does not otherwise dictate, institutional accreditation is adequate for the educational quality assurance needs of society.

Factors other than the inherent limitations of the institutional accrediting process create pressures on institutions to submit specific programs and curricula to the scrutiny of external agencies. These pressures fall into three categories.

1. Professional Concern. This factor has been a prime mover in nearly every specialized accreditation movement. William K. Selden, former director of the National Commission, has written:

> When individuals in a particular group discover that they are using a common body of knowledge which has been developed and is identifiable and communicable through an intellectual process of higher education, inevitably they band together to form a professional association. Not only do they aim to create an organization which will foster research, advance learning in the profession, and improve service to the public, but they develop an impelling motive to raise individual status by restricting admission to the profession--sometimes with more emphasis on the interests of the practitioners than on the public welfare.

Frank G. Dickey, Executive Director of the National Commission, speaking to this point at the 66th Annual Congress on Medical Education, said:

> A profession has a social responsibility to assure society that its present and future membership will be adequately educated and prepared to assume those responsibilities which society expects of the profession.
>
> It should also be noted that members of a profession have a social, monetary, and professional concern that their individual status will not be adversely affected or undermined by the intrusion of incompetent practitioners. This concern has been likened on occasion to a property right.
>
> One of the problems in accrediting today is that this second motivating factor for accrediting, as important as it may be, has from time to time outweighed the social responsibilities in the accrediting standards and procedures.

An extension of this professional interest--and one which has far-reaching implications for the subject of this conference--is becoming increasingly evident. The professions are, for various reasons, becoming intensely interested in the education of the technologists or technicians (by whatever name) who work under their direction or in an allied field.

Charles Ward's survey of accrediting agencies revealed a considerable body of interest on the part of established professional associations, already in the accrediting business, which are actively interested in effecting quality in the education of technologists and/or technicians in their fields. At least one, the American Institute of Architects, has developed a "certification" system for two-year architectural technician programs.

The pressures--and they can be substantial--will, no doubt, continue to grow in view of the rapid growth of technical education programs. The argument for specialized accreditation by professional societies in the technical fields will take a simple and forceful tack: "The institutional accreditation process," the proponents will argue, "is not adequate to assure well trained technologists or technicians for our field; therefore, we must begin an accreditation program."

2. Status Seeking. This pressure might be defined as the socially undesirable manifestations of "professional concern." As Bill Selden pointed out in the principle he enunciated, first, specialized occupations tend to band together in associations; second, they plan ways to restrict admission; and third, they seek to implement these restrictions through certification, licensure, or requiring graduation from an accredited educational program or apprenticeship program--programs controlled by the affected group, of course.

This pressure also tends to create conflict within educational institutions. Those directly responsible for the education program desire to teach or administer a program which meets special standards. It gives them additional status within their institution and marks them as educators in a specialized field. This often puts them in opposition with the institution's chief administrator, who seeks to limit such activities. The stories are plentiful about the president who vociferously opposed accreditation in a specialized field only to learn that his own dean or department head was a national leader in the movement. Messersmith and Medsker, in their study of Accreditation of Vocational-Technical Curricula in Postsecondary Institutions, documented the fact that a much higher percentage of faculty and department chairmen favored specialized accreditation than did deans and presidents.

The history of accreditation to date indicates that the specialized interests, whether they be in the form of professional concern or in the form of status seeking, win out over a period of time.

3. Licensure, Certification, or Registration. A clear picture of the relationship of accreditation to licensure, certification, and registration is not available. Neither are the trends in such practices readily apparent. It is apparent, though, that licensure for occupations is increasing at a rapid rate.

A United States Department of Labor Manpower Research Monograph, published in 1969, reports that licensure laws have doubled in the last quarter century. A review of the state codes for 1968-69 showed almost 2,800 statutory provisions requiring occupational licenses. Some, at least, require graduation from an accredited program in order to be eligible to sit for the licensure examination. (A December, 1969 decision by the Appellate Court of Illinois has called into question the practice of requiring graduation from a program accredited by a nongovernmental agency in order to be eligible to sit for a licensure examination. The court held that such a practice was an invalid delegation of power by a state licensure authority.)

Given the rapid increase in licensure statutes and the ability of occupational groups to obtain favorable legislation from state legislatures, it is highly likely that licensure provisions will create new pressures for specialized accreditation. It also seems to be indisputable that the certification or registration practices of professional societies and occupational specialties will continue to generate pressures for specialized accreditation.

The Path Ahead

It seems reasonably clear that the pressures for specialized accreditation to be superimposed over institutional accreditation in a large number of fields will continue unabated. That many new agencies will achieve recognition for specialized and professional accreditation, many at the associate degree occupational level, seems probable within the context of intensified occupational specialization.

All of this will probably happen despite the cries of educational administrators over the rising costs of accreditation and the rising demands made on their institutions by outside agencies. Beefing up the institutional process to the point where it can significantly relieve pressures for specialized accreditation is a Herculean task.

It is highly likely that the accreditation hierarchy is about to experience a significant crunch--something will give and some modifications will be made. Institutional and specialized accreditation will survive and remain as vitally necessary as ever, but both may take slightly different twists. Few would venture a guess as to what these new twists might be. It might prove useful, however, to take a brief look at an impending study of accreditation of selected health educational programs. Hopefully, this study can be launched within the next few weeks.

The study should be of particular interest to this conference because it is in the allied health area that specialized accreditation is proliferating at its most rapid rate, and it is in this field that the majority of the programs are now falling into the occupational education area.

The Council on Medical Education of the American Medical Association, in collaboration with a number of professional and speciality groups, now accredits 15 separate programs in allied health education with 14 separate sets of essentials. A campus having all 15 programs would be required to host 15 different accrediting teams. It is likely that in the future these institutions will also be required to pay 15 different accrediting fees. Currently, however, accreditation fees are charged in only nine fields. No special criticism is meant here by singling out the AMA; rather, the AMA program is cited as an example of what is happening and can be expected to happen soon in other fields unless new approaches are found.

One possibility of the allied health study is that it will point to the need for a "cluster" approach to specialized accreditation in certain fields, thereby providing the protection society needs relative to practitioners and easing the rapidly growing burden which institutions are having to assume in support of the accreditation process. Whether any such approach will prove feasible and acceptable to the myriad interests in allied health remains to be seen. It does seem certain that some new approach will be required to keep accreditation from falling under its own ponderous weight.

It would seem that institutional accreditation is also obligated to make its procedures more relevant and more acceptable for occupational education programs which do not require specialized accreditation. Institutional accrediting agencies must realize that, through years of neglect of vocational-technical education, they have created a credibility gap with many occupational educators. Despite a great deal of fanfare in recent months, many occupational educators are not yet convinced that the regional associations are serious about providing accreditation for vocational-technical education programs. Increasing the number of occupational educators on visiting teams, policy-making committees, executive councils, and commissions can help alleviate these fears and, in turn, greatly reduce pressures for specialized, programmatic, or categorical accreditation for this field of education.

By making some rapid but well considered adjustments, we can retain the social utility of both specialized and institutional accreditation and ease the accreditation burden for institutions.

THE ROLE OF THE ACCREDITATION AND INSTITUTIONAL ELIGIBILITY STAFF OF THE U. S. OFFICE OF EDUCATION IN ACCREDITATION OF POSTSECONDARY OCCUPATIONAL EDUCATION

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National Conference on Accreditation of
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I have been asked to speak today on the subject of "The Role of the Accreditation and Institutional Eligibility Staff of the U. S. Office of Education in Accreditation of Postsecondary Occupational Education." Given a title such as this, where we refer to the "role" of a government agency in the accreditation of a major area of American education, I believe that it might be proper initially to assure everyone that the U. S. Office of Education is not about to embark on the task of accrediting occupational education. The Office of Education is committed to the proposition that accreditation, as a vital educational function, appropriately should be conducted by responsible private agencies. However, it may be expected to remain committed to that position only so long as this is in the best interests of the general public.

If the Office of Education is not going to commence actually accrediting occupational education schools and programs, it might well be asked if it has any role to perform in this area at all. The answer to that is that it most definitely does have an appropriate role to perform. The nature of the contemporary American society, the importance of quality education for all citizens, and the extensive interrelationship of government with the educational endeavor of the nation are all factors dictating a vital interest and a positive role in this area on the part of the Office of Education.

In general terms, it is the role of the Accreditation and Institutional Eligibility Staff to serve as the Office of Education's agent in supporting constructive developments within the education community insofar as accreditation is concerned, in serving as a catalyst and stimulator in improving accreditation, in protecting the Federal interest, and--finally, but most importantly--in protecting the general public interest as accreditation impinges upon that interest.

The specific major functions of the Accreditation and Institutional Eligibility Staff are as follows:

1. Continuous review of procedures, policies, and issues in the area of the Office of Education's interests and responsibilities relative to accreditation and eligibility for funding.

2. Administration of the eligibility for funding process;

3. Administration of the process whereby accrediting associations secure initial and renewed recognition by the Commissioner of Education;

4. Liaison with accrediting associations;

5. Consultative services to institutions, associations, other Federal agencies, and Congress regarding accreditation and eligibility for funding matters;

6. Interpretation and dissemination of policy relative to accreditation and eligibility for funding issues in the case of all appropriate programs administered by the Office of Education;

7. Conduct and stimulation of appropriate research; and

8. Support for the Commissioner's Advisory Committee on Accreditation and Institutional Eligibility.

How, then, do the above relate to our role in the accreditation of postsecondary occupational education?

One of the significant features of the development of American education during the decade of the 1960's has been what we might well call a "coming of age" for postsecondary vocational-technical-occupational education. As we look forward into the decade of the 1970's, it seems safe to prophesy that occupational education will continue to enjoy considerable growth and development; and like all growth situations, it is likely to have its growth pains.

In the past, accreditation has been of little relevance or significance to postsecondary occupational education. However, in this developmental era into which we now have moved, this is no longer true. The important role which accreditation has to play and the contributions which it can make to the sound development of occupational education have led to an increasingly intense interest in accreditation for vocational-technical education on the part of all those interested in the development of this area of education. Accreditation has a vital public role to play in American society today, and if properly developed and conducted, it should be a major constructive tool for vocational-technical education. If we are going to have a healthy society, we must have a healthy system of postsecondary vocational-technical education.

Vocational education is a distinct, yet highly diverse sector of American education. As such, it has its own special needs, problems, techniques, and strengths. While it may learn much from educators in other fields, they may also learn much from educators in the vocational-technical field.

Vocational educators have no intention of being dominated by educators from other fields or of being forced into false patterns of operation. Therefore, I would emphasize to you today that, in order for accreditation to be accepted by the vocational-education community and by others who are the friends of vocational education, accreditation for vocational education must be developed and conducted largely by the vocational education community. Not only must vocational educators be given their rightful responsibility in the accreditation process, they also have a right to expect that valid and reasonably uniform standards will be developed for the accreditation of occupational education programs and schools. I seriously doubt if there is today any educationally sound reason why the standards for accreditation of vocational schools should vary markedly from one state or region to another. If there are such reasons, the burden of proof for this variance lies with the accrediting agencies themselves.

The most important question for the Office of Education concerning the accreditation of postsecondary occupational education, of course, has to do with the nature of its future course of development--or lack of such. As we look into the future, I would assure you that the Office can be expected to support accreditation for occupational education only to the extent that the following concepts are incorporated within such an accreditation effort:

1. Vocational education is a distinct and unique sector of American education. It is also a highly diverse sector of the educational spectrum and a type of education which is being increasingly intermingled (for better or for worse) with traditional academic education within the same institutional setting.

2. Vocational education is rapidly emerging as a dynamic and important segment of education. The achievement of vital social goals is inseparably bound to a flourishing system of quality vocational education directly oriented to the needs of employers and students.

3. Developments which would benefit the area of vocational education would also benefit American education as a whole.

4. Educators involved in accreditation of other sectors of education have a vital leadership and supportive role, and a responsibility to assist, in the development of accreditation for vocational education.

5. Accreditation for vocational education, if it is to be valid, ultimately must be developed, accepted, and conducted by the vocational education community.

6. Accrediting bodies are performing an increasingly important societal role, and the residual function of accreditation for postsecondary occupational education must be to protect the public interest.

AN ANALYSIS OF ACCREDITATION OF POSTSECONDARY OCCUPATIONAL EDUCATION IN THE UNITED STATES

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Introduction

One of the major goals of the Center for Occupational Education at North Carolina State University is the improvement of the evaluation of the quality and effectiveness of occupational education. To this end several research projects concerning various facets of the evaluative process in occupational education have been initiated. Among these are projects dealing with the economic returns of occupational education, effective budgeting and allocation of resources, effective policy-making, the assessment of student achievement, and the development of standards and criteria for the evaluation of occupational education.

This paper entails a summary of the findings and conclusions of a preliminary study in the area of the development of standards and evaluative criteria. The preliminary study focused on a determination of the current state of evaluation of postsecondary occupational education and was premised upon the assumption that before a systematic effort to develop standards and evaluative criteria is begun, a thorough knowledge of existing practices and techniques is desirable. The study encompassed the activities, practices and procedures of (1) the regional accrediting associations, (2) the specialized accrediting agencies, (3) the federal government, and (4) the various states to the extent that the activities of these entities impinge upon the evaluation of postsecondary occupational education.

Background

The increasing demand for technically and vocationally trained personnel over the last decade has resulted in a tremendous expansion of postsecondary occupational education. To meet this demand, both state and federal governments have increased emphasis on, and support for, postsecondary occupational education. Prior to 1960 the federal government contributed approximately $50 million a year to all vocational education. The 1963 Vocational Education Act abandoned the previously used concept of categorized allocation and raised the authorized federal contribution to a plateau of $225 million in 1965. Amendments enacted in 1968 raised the authorization to $542 million (all titles) for 1968 with annual increments reaching a plateau of $910 million by 1973. Thus, within the 1960-70 decade the federal contribution to vocational education, a large portion of which is earmarked for postsecondary schools, increased over eighteen-fold. Additionally, the federal government has provided funds under the Manpower Development Training Act of 1962, the Allied Health Professions Personnel Training Act of 1963-66, the Nurses' Training Act of 1964, the Higher Education Act of 1965, the Economic Opportunity Act of 1965, and the Health Manpower Act of 1968. Each of these acts provides substantial funds for postsecondary occupational education. At the same time many of the states have reacted by establishing or expanding statewide systems of community colleges, technical institutes, or area vocational schools and by appropriating ever-increasing amounts for occupational education. For example, on a nationwide average during 1968 the states were appropriating $3.65 for each dollar of federal funds appropriated under the 1963 and 1968 Vocational Education Acts.

Concomitant with the increased federal and state emphasis upon occupational education, there has been an emphasis upon research and evaluation to determine the quality and effectiveness of programs of occupational education. The 1963 Vocational Education Act required the establishment of a National Advisory Council to make a study (repeated at five-year intervals) of vocational education and to report to and advise the Secretary of Health, Education, and Welfare by January, 1968, concerning its recommendations for vocational education. Further, a substantial portion of the 1963 Act funds were earmarked for research, evaluation, development, and experimentation. The 1968 Amendments expanded the duties of the National Council to include a review of the administration and operation of vocational education programs, including the effectiveness of such programs in meeting the purposes for which they were established and operated; to conduct independent evaluations of programs; and to review possible duplication of vocational education programs at the postsecondary and adult levels. The 1968 Amendments also required each state to establish an advisory council to perform at the state level functions analogous to those of the National Advisory Council. The 1968 Amendments also stipulated that ten percent of all funds allocated to the states be used for research, training, development, experimentation, and evaluation.

Monies appropriated under the 1963 Vocational Education Act and the 1968 Amendments are allocated to the respective states and are spent in accordance with a previously approved state plan. However, many of the other acts enumerated above, including the Nurses' Training Act of 1964, the Higher Education Act of 1965, and the Allied Health Professions Personnel Training Act of 1966, allocate funds directly to individual institutions. To provide some degree of assurance that these funds are allocated only to institutions meeting minimum educational standards, Congress has included provisos in these acts to the effect that institutions are eligible recipients only if they (or a particular program to be funded) are accredited by a "nationally recognized" accrediting agency. Such provisos require the Commissioner of Education to provide a list of these nationally recognized accrediting agencies or associations which he determines to be reliable authorities on the quality of education offered within a particular program or institution. With the exception of one or two state agencies, the Commissioner of Education has turned to the regional accrediting associations and a number of specialized accrediting agencies to be arbiters of institutional or program quality. Although practically all of these agencies are extralegal and participation is "voluntary," they have, by virtue of these enactments, become quasigovernmental. Subjugation to their bylaws and regulations and adherence to their standards and evaluative criteria are necessities if a public institution is to receive federally appropriated monies collected from the taxpayers of the respective states.

Since the extralegal accrediting associations are presently serving a governmental function by determining institutional eligibility for substantial amounts of federal funds, the reliability of the instruments used in the accrediting process and the validity of such instruments in predicting quality in programs of occupational education should be questioned. Other legitimate avenues of concern are: the extent to which these regional and specialized accrediting agencies and associations possess the expertise to make judgments concerning occupational education; the extent to which persons possessing expertise in occupational education are represented on decision and policy-making boards; and the extent to which the public interest is protected by the inclusion on decision and policy-making boards of individuals who represent the public interest and do not have a vested interest in the actions of the agency or association.

In the governmental sphere, there is a dearth of knowledge concerning the procedures and techniques which have been utilized in the evaluation of occupational education and in the extent to which the techniques utilized have been determined to be reliable and valid measures of a quality product.

Time and space prohibit presentation of a comprehensive analysis of literature pertinent to accreditation and evaluation of occupational education. To put the problem in perspective, however, at least a summary is necessary.

Literature reviewed suggested very basic differences among reputable individuals concerning the methods, scope, and procedures utilized by the specialized and regional accrediting agencies. The soundness of their methods and the validity of their criteria were questioned. Furthermore, they were accused of resisting needed changes, of an inability to evaluate quality in education, and of failure to agree among themselves upon relative emphasis to be placed upon different features of the evaluative process.

Strong differences of opinion were found to exist between the academic and vocational educators and within each group over the question of whether the accrediting agencies should even consider occupational education in their evaluative efforts. Those agreeing that at the postsecondary level occupational education should be subject to accreditation disagreed on criteria. One faction argued that occupational education should adhere to and be measured by the same standards applied to higher education in general; another faction contended that the objectives of occupational education differ substantially from those of academic education, and, therefore, separate criteria which measure the extent to which these objectives are met should be used in evaluation. To compound the issue Congress under several different acts has made accreditation by these agencies and associations a prerequisite for receipt of federal funds for certain occupational programs.

In considering research efforts in accreditation and evaluation as they relate to postsecondary occupational education, a dichotomy between the two is immediately apparent. Studies concerning accreditation tend to be descriptive in nature with literally no attempts to ascertain the reliability of evaluative criteria or their validity in predicting a quality product. Two studies indicated very little difference in the product of accredited versus nonaccredited teacher education programs, but the measures considered were not necessarily measures of the effects of an instructional program. One study of small colleges indicated that accreditation affects library allocations and funds for physical facilities, administration, and salaries much more than it affects curriculum changes, innovations, or the evaluation of instruction. It was considered that perhaps this is indicative of the areas of emphasis in the accrediting process.

Recent efforts in the field of occupational education evaluation, conducted outside the realm of accreditation, denote the application of several scientific principles and techniques to the assessment of quality in occupational education. Among the techniques reviewed were cost-benefit analysis, cost-effectiveness analysis, systems analysis, decision-making models, and the development of achievement measures with demonstrated reliability and content validity. None of these techniques were found in the analysis of literature on evaluation in accreditation.

In summary, with regard to occupational education, the literature review indicated a lack of knowledge of: (1) the extent of the accrediting activities of the various accrediting agencies [illegible] the area of postsecondary occupational education; (2) the approach [illegible] the various accrediting agencies to accreditation of postsecondary occupational education; (3) the administrative structure under which such accreditation occurs; and (4) the standards and evaluative criteria used in the accrediting process. A lack of application of scientific evaluative techniques in the process of accreditation was strongly suggested. Further, very few data were available concerning the efforts or the influence of the various states and the federal government in the evaluation or accreditation of occupational education.

Objectives of the Study

The specific objectives of the study were:

1. To gather, synthesize, and analyze data from the various regional and specialized accrediting agencies and associations

in regard to: (a) scope of their activities in postsecondary occupational education; (b) the administrative structure under which accreditation of occupational education is effected; (c) philosophy of accreditation; (d) clientele and membership; and (e) the standards and evaluative criteria utilized to evaluate postsecondary institutions offering occupational education.

2. To ascertain the extent to which the federal government is engaged in activities of an evaluative or accreditative nature within the realm of postsecondary occupational education and to analyze available studies, regulations, or statutes affecting evaluation of postsecondary occupational education.

3. To gather, synthesize, and analyze data concerning the extent to which the various states are engaged in the evaluation or accreditation of postsecondary occupational education and to analyze standards and evaluative criteria used.

4. To determine the extent to which the various state or public institutions within a state are participating or seeking membership in the regional and specialized accrediting agencies.

5. To determine the extent to which federal, state, or local licensing may be a factor in the evaluation of occupational education.

6. To assess the opinions of state officials responsible for vocational education or the operation of state systems of postsecondary area vocational schools, technical institutes, or community colleges regarding their opinions on: (a) the adequacy and pertinence of standards and evaluative criteria used by accrediting agencies to evaluate postsecondary occupational education; (b) the adequacy of specialists in occupational education on association staffs and visitation teams; and (c) whether administrative structures of regional associations are conducive to adequate and fair evaluation of postsecondary occupational education.

Summary of Findings of the Study

The following sections present a summary of the findings of the study as they pertain to (1) the regional accrediting associations, (2) the specialized accrediting associations, (3) the federal government, and (4) the states.

The Regional Accrediting Associations

The concept of regional associations of colleges and secondary schools evolved to cope with the need within a region for more uniform standards among the secondary schools and more uniform entrance examinations among the colleges. The process of "certifying" secondary schools practiced in the late 1890's was broadened to include the concept of "accrediting" colleges and universities. Accrediting first began in the North Central Association in 1913, and it was not until 1952 that the practice was finally adopted by all regional associations.

To put accreditation of institutions offering postsecondary occupational education in proper perspective required an analysis of the administrative structure, philosophy, membership, and evaluative standards and criteria of each of the six regional associations into which the United States is divided.

Analysis of the administrative structures of the various associations showed the approaches to accreditation of postsecondary occupational education to be almost as numerous as the associations. The Middle States Association contended that virtually all postsecondary occupational education in its area was offered in community colleges, and such institutions were accredited by its Commission on Higher Education. The Northwest Association indicated that much the same condition prevailed in its region but acknowledged that its Commission on Higher Schools had recently evaluated and accredited two "technical colleges." The North Central Association acknowledged that a problem existed in its region and that its Commission on Colleges and Universities was assuming responsibility for the accreditation of postsecondary occupational education whether in community colleges, technical institutes, or postsecondary vocational schools, regardless of whether a degree is awarded upon completion. The New England Association and the Southern Association have chosen to demarcate responsibility for accreditation of postsecondary occupational education solely on the basis of whether the institution offering such education awards an associate degree, but here the similarity ends. Within the New England Association, degree-granting institutions are accredited by the Commission on Institutions of Higher Education, whereas the Commission on Public Secondary Schools has been given the responsibility of accrediting both secondary schools and technical-vocational schools. The Commission is presently utilizing an Ad Hoc Committee on Vocational Education to accomplish this purpose. Recent action by the New England Association suggests, however, that a separate independent commission to accredit occupational education from grades 10 through 14 may be created. In the Southern Association the Commission on Colleges has assumed responsibility for the accreditation of all degree-granting institutions including technical institutes, but a separate Committee on Occupational Education has been established (and will probably evolve into an independent commission) to accredit postsecondary institutions not offering an associate degree. Unlike the other regionals, the Western Association has two commissions responsible for accrediting degree-granting institutions. The Commission for Senior Colleges and Universities accredits four-year colleges and universities, whereas the Commission for Junior Colleges accredits all two-year degree-granting institutions. No non-degree postsecondary institutions were acknowledged to exist in the region, but it was indicated that the

Commission for Junior Colleges had accredited a limited number of "special purpose" institutions.

Membership on the boards of trustees and on the commissions of the associations was found to be limited for the most part to persons from accredited institutions, and many of the commissions were found to be self-perpetuating to the degree that they nominate succeeding members subject only to ratification by the membership. Persons without a vested interest or representatives of the public interest were not found in the power structure of any of the regional associations. Moreover, where postsecondary occupational education was found to fall within the purview of the commissions which accredit senior colleges and universities, representation of the institutions offering occupational education was most often not commensurate with the proportion of the membership accounted for by these institutions. Finally, membership on boards of trustees of the associations and on higher commissions accrediting postsecondary occupational education was found to be overwhelmingly dominated by senior college and university presidents, vice-presidents, and deans.

In terms of philosophy no major differences were found to exist among the regional associations. Though variously stated, each espouses "voluntary self-government" and an intent to develop and maintain sound educational standards which "ensure" quality education.

Within each association, membership is institutional and denotes accreditation, but eligibility for consideration for membership appears to differ. The North Central Association, the Middle State Association, and the Southern Association specify that institutions must be either public or non-profit. The stand of the Northwest Association on this issue was not ascertainable from the available data. From analysis of the bylaws, the New England Association and the Western Association apparently do not exclude proprietary schools from eligibility. If public, postsecondary, non-degree granting, occupational education institutions exist in the Middle States Association region, the Northwest Association region, or the Western Association region, such institutions are precluded from eligibility of the "degree-granting" requirement of the commissions accrediting higher education.

The standards and evaluative criteria of the six regional associations were found to cover basically the same areas within an institution. Each association requires an institutional self-evaluation prior to association evaluation, and, though variously grouped, standards usually entailed as a minimum an institution's purposes and objectives, administration, faculty, student personnel, curriculum (programs), physical facilities, library, and finances. Some additionally include graduate schools, research, and special services. Similarities end, however, with areas covered. Standards were found to vary from a series of questions to which an institution must react to very brief and general statements considered as "guides" to elaborately detailed specifications or interpretations which include such criteria as the minimum number of hours the library should be kep open, the minimum acceptable proportion of various levels of advanced degrees held by the faculty members, and the minimum annual budget for various types and sizes of institutions. For the most part, however, standards were found to be very general in nature, couched in "the objectives of the institution," and avowedly more "qualitative" than quantitative. All standards and criteria currently used to accredit postsecondary institutions offering occupational education, except those of the Western Association, were designed by academicians within the four-year colleges and universities to apply to these institutions. Within the Western Association standards were designed specifically for comprehensive public junior colleges which are expected to offer occupational education. At present the North Central Association is modifying its standards "to give recognition to institutions which do not follow the traditional collegiate pattern." Within the Southern Association representatives of occupational education are developing new standards and guidelines to apply to non-degree-granting postsecondary occupational education institutions; the New England Association has developed some standards which, along with criteria used to evaluate technical and vocational curricula in secondary schools, are ultimately to be applied to postsecondary non-degree-granting institutions in the New England region.

From all the materials analyzed and from the literature reviewed, no evidence was found to suggest that the regional associations are interested in, or have engaged in, scientific studies to ascertain the reliability with which standards or evaluative criteria can be applied, to determine the validity of such standards, or to evaluate criteria in predicting the output of a quality product.

Specialized Accrediting Agencies

Program or special purpose accreditation first began in the professions in the early 1900's. Contrary to the aims of institutional accreditation, professional accreditation was motivated by the desires of the individuals in a given profession to attain a high vocational status. By the late 1930's and early 1940's specialized accreditation had spread to certain types of proprietary schools not necessarily operating at the professional level, but usually not eligible for consideration by the regional associations. The 1950's saw a tremendous expansion of and emphasis upon technical and vocational education, much of which was closely allied to the professions. During this period many of the professional accrediting agencies extended their accrediting efforts downward to include these supportive occupations.

The study showed that 31 specialized accrediting agencies are at present recognized by the Commissioner of Education as being a "reliable authority as to the quality of education" offered in certain professions, occupations, or special purpose institutions. These agencies and the type and level of accreditation practiced by each are presented in Table 1. Of these 31 agencies it was found that only nine accredit curricula, programs, or institutions considered occupational in nature. These nine are: (1) the Accrediting Commission for Business Schools; (2) the American Association of Nurse Anesthetists; (3) the American Dental Association; (4) the American Medical Association; (5) the Engineers' Council

Table 1

Specialized Accrediting Agencies and the Type and Level of Accreditation Each Provides

Agency	Type of Accreditation		Level of Accreditation		
	Institutional	Program(s)	Professional	Baccalaureate	Occupational
Accrediting Association of Bible Colleges	x			x	
Accrediting Commission for Business Schools	x			x	
American Association of Collegiate Schools of Business	x		x	x	
American Association of Nurse Anesthetists	x	x			x
American Association of Theological Schools	x	x	x		
American Bar Association		x	x		
American Chemical Society		x		x	
American Council on Education on Journalism		x	x	x	
American Council on Pharmaceutical Education		x	x	x	
American Dental Association		x	x	x	x
American Library Association		x	x		
American Optometric Association	x	x	x		

Agency	Type of Accreditation		Level of Accreditation		
	Institutional	Program(s)	Professional	Baccalaureate	Occupational
American Osteopathic Association	x	x	x		
American Podiatry Association		x	x		
American Public Health Association, Inc.	x	x	x		
American Speech and Hearing Association		x	x		
American Veterinary Medical Association		x	x		
Association of American Medical Colleges		x[a]			
Association for Clinical Pastoral Education		x	x		
Council on Medical Education of the American Medical Association		x	x	x	x
Council on Social Work Education		x	x		
Engineers' Council for Professional Development	x	x	x	x	x
National Architectural Accrediting Board		x		x	

Table 1 (continued)

Agency	Type of Accreditation		Level of Accreditation		
	Institional	Program(s)	Professional	Baccalaureate	Occupational
National Association for Practical Nurse Education and Services, Inc.		x			x
National Association of Schools of Art	x	x	x	x	x[a]
National Association of Schools of Music	x	x	x	x	
National Association of Trade and Technical Schools	x				x
National Council for Accreditation on Teacher Education		x	x	x	
National Home Study Council	x			x	x
National League for Nursing, Inc.		x	x	x	x
Society of American Foresters		x	x	x	

[a] Actually less than baccalaureate, but not normally considered occupational.

for Professional Development; (6) the National Association for Practical Nurse Education and Services; (7) the National Association of Trade and Technical Schools; (8) the National Home Study Council; and (9) the National League for Nursing. For each of these agencies an analysis was made of the administrative structure under which accrediting is implemented, philosophy of accreditation, clientele and membership, and standards and evaluative criteria used.

Administrative structure among the nine agencies or associations was found to vary markedly, particularly when those organizations of a "professional" nature were compared to those of a "proprietary" nature. The accrediting arms of the American Dental Association, the American Medical Association, and the Engineers' Council for Professional Development are not autonomous, but are responsible to either the organization's board of trustees or to the membership, which is comprised entirely of persons in the profession. (The same is true of the American Association of Nurse Anesthetists.) The National Association for Practical Nurse Education and Services and the National League of Nursing are somewhat more representative of other interests in that they have representatives of medicine, hospital administration, and other potential employers of graduates on the accrediting boards. Conversely, the Accrediting Commission for Business Schools, the National Association of Trade and Technical Schools, and the National Home Study Council have accrediting arms which are independent of both the total membership and the board of control of the parent organization. These accrediting boards also have a large component, though never a majority, of persons having no vested interest in the decisions of the board and who could be considered representatives of the public interest.

No major differences in philosophy among the agencies were noted. Though variously stated, their usual aims are to upgrade the profession or the institution, insure a quality output, and "protect the public interest."

Within several of the agencies or associations, clientele and membership are not synonymous. Neither the American Dental Association nor the American Medical Association requires institutional membership, nor do they charge for accreditation services. The National League for Nursing does not require institutional membership but does charge a very substantial accreditation and annual "sustaining" fee. Usually the agencies which accredit in the proprietary realm charge a substantial accrediting fee and require institutional membership and annual dues once an institution is accredited. The number and type of institutions or programs accredited by the several agencies are shown in Table 2.

Analysis of the standards and evaluative criteria used showed substantial differences among the specialized accrediting agencies. Those agencies which accredit institutions were found to have standards similar to those of the regional associations, with those in the proprietary sector placing more stress upon ethical considerations and often having more specific requirements for professional preparation and work experience of faculty. The professional associations were also found to put more

Table 1 (continued)

Agency	Type of Accreditation		Level of Accreditation		
	Institional	Program(s)	Professional	Baccalaureate	Occupational
National Association for Practical Nurse Education and Services, Inc.		x			x
National Association of Schools of Art	x	x	x	x	x[a]
National Association of Schools of Music	x	x	x	x	
National Association of Trade and Technical Schools	x				x
National Council for Accreditation on Teacher Education		x	x	x	
National Home Study Council	x			x	x
National League for Nursing, Inc.		x	x	x	x
Society of American Foresters		x	x	x	

[a] Actually less than baccalaureate, but not normally considered occupational.

for Professional Development; (6) the National Association for Practical Nurse Education and Services; (7) the National Association of Trade and Technical Schools; (8) the National Home Study Council; and (9) the National League for Nursing. For each of these agencies an analysis was made of the administrative structure under which accrediting is implemented, philosophy of accreditation, clientele and membership, and standards and evaluative criteria used.

Administrative structure among the nine agencies or associations was found to vary markedly, particularly when those organizations of a "professional" nature were compared to those of a "proprietary" nature. The accrediting arms of the American Dental Association, the American Medical Association, and the Engineers' Council for Professional Development are not autonomous, but are responsible to either the organization's board of trustees or to the membership, which is comprised entirely of persons in the profession. (The same is true of the American Association of Nurse Anesthetists.) The National Association for Practical Nurse Education and Services and the National League of Nursing are somewhat more representative of other interests in that they have representatives of medicine, hospital administration, and other potential employers of graduates on the accrediting boards. Conversely, the Accrediting Commission for Business Schools, the National Association of Trade and Technical Schools, and the National Home Study Council have accrediting arms which are independent of both the total membership and the board of control of the parent organization. These accrediting boards also have a large component, though never a majority, of persons having no vested interest in the decisions of the board and who could be considered representatives of the public interest.

No major differences in philosophy among the agencies were noted. Though variously stated, their usual aims are to upgrade the profession or the institution, insure a quality output, and "protect the public interest."

Within several of the agencies or associations, clientele and membership are not synonymous. Neither the American Dental Association nor the American Medical Association requires institutional membership, nor do they charge for accreditation services. The National League for Nursing does not require institutional membership but does charge a very substantial accreditation and annual "sustaining" fee. Usually the agencies which accredit in the proprietary realm charge a substantial accrediting fee and require institutional membership and annual dues once an institution is accredited. The number and type of institutions or programs accredited by the several agencies are shown in Table 2.

Analysis of the standards and evaluative criteria used showed substantial differences among the specialized accrediting agencies. Those agencies which accredit institutions were found to have standards similar to those of the regional associations, with those in the proprietary sector placing more stress upon ethical considerations and often having more specific requirements for professional preparation and work experience of faculty. The professional associations were also found to put more

Table 2

Number of Institutions or Programs Accredited by Specialized Accrediting Agencies in the Occupational Field

Accrediting Agency	Type of Program or Institution	Number of Programs or Institutions
Accrediting Commission for Business Schools	1-Yr. Schools of Business	100
	2-Yr. Schools of Business	169
	Junior Colleges of Business	45
	Senior Colleges of Business	4
	Data Processing Institutes	10
American Association of Nurse Anesthetists	Hospital Schools of Anesthesiology	193
American Dental Association	Dental Assistant	151
	Dental Hygienist	68
	Dental Lab Technician	21
American Medical Association	Certified Laboratory Assistant	118
	Cytotechnologist	118
	Inhalation Therapy Technician	55
	Medical Assistant	0
	Medical Record Technician	20
	Nuclear Medicine Technician	0
	Orthopaedic Assistant	0
	Radiation Therapy Technologist	0
	Radiologic Technologist	1,152
Engineers' Council for Professional Development (All are technology programs of at least two academic years' duration)	Aerospace-Aeronautics	5
	Aircraft Design	1
	Aircraft Maintenance	2
	Air Conditioning	6
	Architectural	5
	Automotive and Engine	3
	Chemical	8
	Civil	24
	Commercial Broadcast	1
	Computer and Data Processing	3
	Drafting-Design	25
	Electrical	21
	Electronics	42
	Fire Protection	1
	Industrial	4

Table 2 (continued)

Accrediting Agency	Type of Program or Institution	Number of Programs or Institutions
Engineers' Council for Professional Development (continued)	Instrumentation	1
	Manufacturing and Tool	8
	Mechanical	35
	Metallurgical	1
	Nuclear	1
	Sanitary	1
National Association for Practical Nurse Education and Service	Practical Nursing Programs	42
National Association of Trade and Technical Schools	Private Trade and Technical Schools	166
National Home Study Council	Private Home Study Schools	120
National League of Nursing	Associate Degree Nursing Programs	66
	Diploma Nursing Programs	567
	Practical Nursing Programs	17

stress upon professional standing and experiences of the faculty and to also specify or recommend licensing and/or certification within the specialty taught. Considerably less emphasis was placed upon supporting services and facilities such as libraries, student personnel services, classrooms, and overall administration. As was true of the regional associations, no evidence was found which would indicate any scientific effort in the development of standards or evaluative criteria, nor were any studies concerning reliability or validity of instruments noted.

The Federal Government

The study entailed an analysis of federal government programs and operations which have a substantial involvement in occupational education and which have implications for either accreditation or evaluation in the field of occupational education. Functions conforming to these criteria were analyzed in the Office of Education, the Department of Labor, the Office of Economic Opportunity, the Veterans' Administration, and the Federal Aviation Agency.

Within the Office of Education, the major implication for evaluation of occupational education was found to be in the extensive research funding done by the Bureau of Research. With regard to accreditation, the major implication lies in the fact that the Commissioner of Education is required by congressional mandate to maintain and publish a list of accrediting associations and agencies which he recognizes as being authoritative assessors of quality in certain regions, institutions, or subject matter areas. The study showed that approximately thirty categories of federal aid to public institutions, as provided by eight laws enacted since 1963 alone, require accreditation by these "recognized" agencies as a prerequisite for the allocation of federal funds. To effect the evaluation of the various accrediting agencies requesting national recognition, an Accreditation and Institutional Eligibility Staff has been created within the Bureau of Higher Education. This Staff is currently assessing the procedures and criteria used by the regional accrediting associations and several of the specialized accrediting agencies which were initially recognized by the Commissioner solely because recognition was accorded them by the National Commission on Accrediting.

Within the Department of Labor and the Office of Economic Opportunity, most evaluation of occupational education was found to be either of a job placement or of a cost-benefit nature which is of more value to the economists than to educators, or at best can serve as only one of many inputs in educational decision-making. One study did approach evaluation on a cost-effectiveness basis which is of more relevance to education.

The Veterans' Administration, in administering the veterans' training programs, was found to rely upon accrediting agencies or associations recognized by the Commissioner of Education or upon state approval agencies to evaluate programs or institutions for approval by the Veterans' Administration. Guidelines set forth for the state approving agencies were very general and overwhelmingly quantitative. A third alternative for the approval of veterans' benefits is that all vocational programs receiving federal funds through the Smith-Hughes and subsequent vocational acts which require conformity to a state plan are automatically approved under the law.

Finally, the federal Aviation Agency was found to operate a very large program of certification and licensing for the civilian aviation industry. Examination of the criteria used to evaluate aircraft mechanic schools showed them to be totally quantitative and process-oriented, but this quantitative process evaluation is complemented by a rigorous written, oral, and performance examination effort which is highly qualitative and a prerequisite for licensing the individual.

State Programs of Accreditation Evaluation and Approval

Analysis of data collected from 41 state directors of vocational education and 39 directors of state systems of two-year colleges showed that only seven states--Florida, Kansas, Maryland, Missouri, Montana, Oklahoma, and Wisconsin--operate a program of formal institutional accreditation involving either two-year colleges or other postsecondary institutions offering occupational education. An additional nine states indicated the use of a program of institutional evaluation. These states are Colorado, Iowa, Kentucky, New Mexico, North Carolina, Rhode Island, South Carolina, South Dakota and Texas. Whether the programs operated by Rhode Island and Texas applied to the postsecondary level was not readily ascertainable, although such was indicated; it was determined that the materials were developed for use at the secondary level. Several additional states indicated the use of program approval in postsecondary occupational education, and only 11 states indicated that neither accreditation, institutional evaluation, program approval, nor curriculum approval or evaluation was practiced. The various types of evaluation or accreditation in operation in the various states are summarized in Table 3.

To the extent that materials were provided, the standards and evaluative criteria used by each state were synthesized and analyzed. As they pertained to institutional accreditation or evaluation, the materials were not found to be markedly different from those of the regional associations. Some of the states were found to have gone further, however, in the development of evaluative criteria as measures of broad standards than have the regional associations. Where program or curriculum evaluation was found to be practiced, the standards and evaluative criteria tended to be more objective than those used for institutional evaluation. Efforts toward objectivity included the use of present-absent or yes-no dichotomies and the use of various types of rating scales. Even so, it was noted that a subjective assessment by a rater was more often the rule. No study concerning reliability or validity of the instruments used was uncovered in any of the materials reviewed.

Table 3

Presence of State Programs of Institutional Accreditation, Institutional Evaluation, Program Approval, or Curriculum Approval in Public Post-High School Institutions Offering Occupational Education

State	Activity				Applicability	
	Institutional Accreditation	Institutional Evaluation	Program Approval	Curriculum Approval or Evaluation	Vocational-Technical Schools	Junior or Community Colleges
Alabama	No	No	Yes	Yes	x	x
Alaska	No	No	No	Yes	x	x
Arizona	No	No	Yes	Yes		x
Arkansas	No[a]	No[a]	No[a]	No[a]		x
California	No	No	No	Yes		x
Colorado	No	Yes	Yes	Yes	x	x
Connecticut	No	No	No	No	x	x
Delaware	No	No	Yes	Yes		x
Florida	Yes	Yes	Yes	Yes	x	x
Georgia	No[a]	No[a]	No[a]	No[a]		x
Hawaii	No	No	Yes	Yes		x
Idaho	No	No	No	Yes	x	
Illinois	No	No	No	Yes		x
Indiana	No	No	Yes	Yes	x	
Iowa	No	Yes	Yes	Yes	x	x
Kansas	Yes	Yes	Yes	Yes	x	x
Kentucky	No	Yes	Yes	Yes	x	x

Table 3 (continued)

	Activity				Applicability	
State	Institutional Accreditation	Institutional Evaluation	Program Approval	Curriculum Approval or Evaluation	Vocational-Technical Schools	Junior or Community Colleges
Louisiana	No	No	Yes	Yes	x	
Maine	No	No	No	No	x	
Maryland	Yes[a]	Yes[a]	Yes[a]	Yes[a]		x
Massachusetts	No[b]	No[b]	Yes[b]	Yes[b]	x	
Michigan[c]						
Minnesota	No	No	Yes	Yes	x	x
Mississippi[c]						
Missouri	Yes	Yes	No	No		x
Montana	Yes	Yes	No	Yes	x	x
Nebraska	No	No	No	Yes	x	
Nevada	No	No	Yes	No	x	x
New Hampshire	No	No	Yes	No	x	
New Jersey	No[a]	No[a]	Yes[a]	Yes[a]		x
New Mexico	No	Yes	No	Yes	x	
New York	No	No	Yes	Yes	x	x
North Carolina	No	Yes	Yes	Yes	x	x
North Dakota			No Response			
Ohio	No	No	Yes	Yes	x	x
Oklahoma	Yes	Yes	Yes	No		x

Table 3 (continued)

State	Activity				Applicability	
	Institutional Accreditation	Institutional Evaluation	Program Approval	Curriculum Approval or Evaluation	Vocational-Technical Schools	Junior or Community Colleges
Oregon	No	No	No	Yes		x
Pennsylvania	No	No	Yes	Yes		x
Rhode Island	No[b]	Yes[b]	Yes[b]	No[b]	x	
South Carolina	No	Yes	Yes	Yes	x	
South Dakota	No	Yes	Yes	Yes	x	
Tennessee	No[b]	No[b]	No[b]	Yes[b]	x	
Texas	No	Yes	Yes	Yes	x	x
Utah	No[b]	No[b]	No[b]	No[b]		
Vermont No	No	No	No	x		
Virginia	No	No	Yes	Yes	x	x
Washington	No	No	No	Yes		x
West Virginia	No	No	Yes	Yes	x	
Wisconsin	Yes	Yes	Yes	Yes	x	x
Wyoming	No	No	No	No		

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[a] Applies to community or junior colleges only.
[b] Applies to Vocational-Technical Schools only.
[c] Data not provided.

Data gathered concerning regional association accreditation of institutions within the various states showed that nationwide there are more postsecondary institutions offering occupational education which are not accredited (533) than there are which are accredited (486). Analysis of the data on the basis of regional association areas showed that the problem of nonaccredited institutions was most acute in the areas served by the North Central Association and the Southern Association. These data are shown in Table 4.

Concerning the perceptions of accreditation of occupational education by the regional associations held by state directors of vocational education and directors of state systems of two-year colleges, the majority of those responding felt that occupational education specialists on regional association staffs and on visitation teams are inadequate. Further, a majority of those responding felt that standards and evaluative criteria used to accredit occupational education are neither adequate nor relevant. A breakdown of these responses is shown in Tables 5, 6, and 7 on pages 42, 43, and 44.

State and local licensing were found to be a major factor in no more than 10 occupations. Primarily these are in the health or paramedical field--registered nursing, practical nursing, X-ray technology, dental hygiene, etc. In the building trades plumbing and electrical wiring most often are licensed occupations, and in service occupations barbering and cosmetology are most often licensed. The extent to which licensing of graduates of various occupational curricula is a factor is depicted in Table 8.

Conclusions and Implications

From the study certain conclusions appear warranted--indeed demanded.

Regional Accrediting Associations

Problems relating to accreditation by regional associations of institutions offering postsecondary occupational education are attributable to three primary sources: (1) administrative structure; (2) inadequate and irrelevant standards; and (3) a lack of scientific foundation in the accrediting process.

Among the regional associations the approaches to accreditation of postsecondary occupational education are as numerous as the associations themselves, none of which, to this date, are adequate to the task. Currently, postsecondary institutions offering occupational education but not awarding associate degrees are eligible for accreditation in only two of the regional associations, the Southern and the New England Association. Within these two associations, associate degree-granting technical institutes and two-year colleges which offer job-oriented occupational education are accredited by the commissions which accredit

Table 4

Accredited Status of Post-High School Institutions Offering Occupational Education--by State and Regional Association

Regional Association	State	Correspondent Status	Affiliate Status	Fully Accredited Status	Not Accredited
Middle States	Delaware	1	1	3	0
	Maryland[a]	1	2	10	0
	New Jersey			(5)[d]	(1)
	New York	6	8	28	0
	Pennsylvania	3	6	3	0
	District of Columbia[c]				
	Total	11	17	44 + (5)	0 + (1)
New England	Connecticut	0	0	4	(12)
	Maine	2	0	0	3
	Massachusetts	0	0	(4)	10 + (10)
	New Hampshire	0	10	3	8
	Rhode Island	0	0	1	(1)
	Vermont	0	0	0	1
	Total	2	10	8 + (4)	22 + (23)

Table 4 (continued)

Regional Association	State	Corre-spondent Status	Affiliate Status	Fully Accred-ited Status	Not Accredited
North Central	Arizona[b]	3	0	7	0
	Arkansas[a, c]			(1)	(2)
	Colorado	5	1	11	3
	Illinois[a, c]			(21)	(13)
	Indiana	1	2	30	3
	Iowa[a]	5	0	4	11
	Kansas	13	2	4	0
	Michigan[c]			(14)	(9)
	Minnesota	0	0	0	27
	Missouri[c]			(6)	(6)
	Nebraska	1	0	0	7
	New Mexico	0	0	14	1
	North Dakota		No Response		
	Ohio[a, c]			(5)	(2)
	Oklahoma	1	2	31	15
	South Dakota	0	0	5	0
	West Virginia	0	0	0	3
	Wisconsin[b]	4	2	2	10
	Wyoming	2	7	9	2
	Total	35	16	116 + (49)	82 + (34)

Table 4

Accredited Status of Post-High School Institutions Offering Occupational Education--by State and Regional Association

Regional Association	State	Corre-spondent Status	Affiliate Status	Fully Accred-ited Status	Not Accredited
Middle States	Delaware	1	1	3	0
	Maryland[a]	1	2	10	0
	New Jersey			(5)[d]	(1)
	New York	6	8	28	0
	Pennsylvania	3	6	3	0
	District of Columbia[c]				
	Total	11	17	44 + (5)	0 + (1)
New England	Connecticut	0	0	4	(12)
	Maine	2	0	0	3
	Massachusetts	0	0	(4)	10 + (10)
	New Hampshire	0	10	3	8
	Rhode Island	0	0	1	(1)
	Vermont	0	0	0	1
	Total	2	10	8 + (4)	22 + (23)

Table 4 (continued)

Regional Association	State	Corre-spondent Status	Affiliate Status	Fully Accred-ited Status	Not Accredited
North Central	Arizona[b]	3	0	7	0
	Arkansas[a, c]			(1)	(2)
	Colorado	5	1	11	3
	Illinois[a, c]			(21)	(13)
	Indiana	1	2	30	3
	Iowa[a]	5	0	4	11
	Kansas	13	2	4	0
	Michigan[c]			(14)	(9)
	Minnesota	0	0	0	27
	Missouri[c]			(6)	(6)
	Nebraska	1	0	0	7
	New Mexico	0	0	14	1
	North Dakota		No Response		
	Ohio[a, c]			(5)	(2)
	Oklahoma	1	2	31	15
	South Dakota	0	0	5	0
	West Virginia	0	0	0	3
	Wisconsin[b]	4	2	2	10
	Wyoming	2	7	9	2
	Total	35	16	116 + (49)	82 + (34)

Table 4 (continued)

Regional Association	State	Corre-spondent Status	Affiliate Status	Fully Accred-ited Status	Not Accredited
Northwest	Alaska[b]	0	0	3	14
	Idaho[b]	0	0	5	0
	Montana	8	0	9	0
	Nevada	2	0	1	0
	Oregon	0	3	9	0
	Utah	0	0	3	0
	Washington	2	0	20	0
	Total	12	3	50	14
Southern	Alabama	4	6	7	36
	Florida	3	7	22	18
	Georgia	0	5	26	20
	Kentucky[b]	0	0	0	12
	Louisiana	0	0	0	32
	Mississippi[a]	3	0	14	0
	North Carolina	22	0	11	17
	South Carolina	8	1	2	3
	Tennessee	0	22	1	0
	Texas	0	0	34	9
	Virginia	12	5	3	0
	Total	52	46	120	147

Table 4 (continued)

Regional Association	State	Corre-spondent Status	Affiliate Status	Fully Accred-ited Status	Not Accredited
Western	California	0	0	90	0
	Hawaii	5	0	0	1
	Total	5	0	90	1
Grand Total		117	92	428 + (58)	266 + (58)

[a] Reply from community or junior college director only.

[b] Reply from state director of vocational education only.

[c] Data not provided.

[d] Data in parentheses were taken from Directory American Association of Junior Colleges, 1968. Figures represent only junior or community colleges, and institutions were listed as either accredited or not accredited by the respective regional association.

Table 5

Reactions of State Directors of Vocational Education and State Directors of Two-Year College Systems Concerning the Adequacy of Accreditation and Evaluation in Occupational Education Performed by Regional Associations, Specialized Agencies, and States

Regional Association	Regional Associations		Specialized Agencies		States	
	Adequate	Inadequate	Adequate	Inadequate	Adequate	Inadequate
Middle States	5	0	2	1	3	0
New England	1	1	1	1	1	0
North Central	0	13	3	2	7	4
Northwest	1	2	2	1	3	0
Southern	4	5	2	2	5	1
Western	1	2	1	0	1	0
Total	12	23	11	7	20	5
Percent of Total	34	66	61	39	80	20

Table 6

Reactions of State Directors of Vocational Education and State Directors of Two-Year College Systems Concerning the Adequacy of Specialists in Occupational Education on Regional Association Staffs and Evaluation Teams, and the Adequacy of Evaluative Criteria Used

Regional Association	Regional Association Staffs		Regional Association Evaluation Teams		Evaluative Criteria	
	Adequate	Inadequate	Adequate	Inadequate	Adequate	Inadequate
Middle States	1	0	2	0	3	0
New England	0	1	2	2	1	2
North Central	0	6	0	6	0	4
Northwest	0	1	2	1	1	2
Southern	2	1	2	2	0	4
Western	0	0	0	0	0	0
Total	3	9	8	11	5	12
Percent of Total	25	75	42	58	29	71

Table 7

Summary Responses of State Directors of Vocational Education and State Directors of Two-Year College Systems Concerning Suitability of Administrative Structure, Adequacy of Staff, and Relevance of Criteria Used by Accrediting Associations to Accredit Postsecondary Occupational Education

Regional Association	Total States	System Directors	Total Response	Positive Response	Negative Response
Middle States	5	Vocational Education	1	1	0
		Two-Year Colleges	4	4	0
New England	6	Vocational Education	3	1	2
		Two-Year Colleges	2	0	2
North Central	19	Vocational Education	10	0	9[a]
		Two-Year Colleges	6	0	4[a]
Northwest	7	Vocational Education	3	0	1[a]
		Two-Year Colleges	3	1	2
Southern	11	Vocational Education	5	1	4
		Two-Year Colleges	5	1	4
Western	2	Vocational Education	1	0	1
		Two-Year Colleges	2	1	1
Total	50	Vocational Education	23	3	17
		Two-Year Colleges	22	7	13
Percent of Total		Vocational Education	100	13	74
		Two-Year Colleges	100	32	59

[a] Differences in total response and positive response not accounted for by negative response are due to noncommital responses.

Table 8

Occupational Curricula Which Require Licensing of Graduates

Occupation	Number of States Requiring
Automotive Mechanics	3
Aviation Mechanics	22
Barbering	34
Carpentry	1
Medical Laboratory Assistant	3
Commercial Electrician	21
Cosmetology	38
Dental Assistant	15
Dental Hygienist	21
Funeral Director	1
Land Surveyor	1
Mason	1
Motor Vehicle Salesman	1
Mobile Home Salesman	1
Medical Laboratory Technician	1
Mortician	1
Inhalation Therapist	2
Insurance Adjuster	1
Junior Accountant	1
Plumber	19
Practical Nurse	39
Radio-T.V. Technician	4
Real Estate Salesman	2
Registered Nurse	37
X-Ray Technician	20

four-year colleges and universities. Non-degree-granting institutions in the New England Association are accredited by an ad hoc committee under the secondary school commission and the Southern Association by a recently formed Committee on Occupational Education. These variations exist even though the programs may be identical in scope, level, and intent between the degree-granting and non-degree-granting institutions.[1] In the Middle States Association, the Northwest Association, and the North Central Association, only degree-granting institutions are, at this time, eligible for consideration for accreditation, in each instance by the commission which accredits four-year colleges and universities. (The North Central Association is taking steps to extend eligibility to non-degree-granting institutions.) In the Western Association there is a separate Junior College Commission which accredits degree-granting two-year institutions only.

Clearly these prevailing conditions are attributable to the archaic administrative structures under which the regional associations were initially formed to accredit four-year colleges and universities on the one hand and secondary schools on the other in an era during which occupational education was confined to apprenticeable trades or relegated to "vocational training schools" for deliquents. Today occupational education is an entity in its own right. It deserves equal standing with academic education in the secondary schools, colleges, and universities and is entitled to be governed by those with expertise in occupational education. Analysis of the composition of the commissions which accredit colleges and universities makes it abundantly clear that these commissions are dominated by those in higher education, primarily chancellors, presidents, and vice-presidents of colleges and universities. In the Southern Association, for example, the Commission on Colleges, which is jealously guarding its self-proclaimed prerogative to accredit all institutions offering associate degrees, including technical institutes which offer no programs designed for transfer, has an institutional membership comprised of approximately 60 percent four-year institutions and 40 percent two-year colleges and technical institutes. Yet only 19 percent of the Commission membership represents such two-year institutions. As a matter of fact, the public schools have more representation (20 percent) on the Commission than do the two-year colleges. In the Middle States Association two-year colleges account for more than 14 percent of the institutional membership of the Commission on Higher Education, yet out of 17 members the Commission has only 1 member (6 percent), a community college dean, representing two-year colleges. The North Central Association Commission on Colleges and Universities at present has 5 of 64 members (8 percent) representing two-year colleges, yet such institutions comprise 20 percent of the membership. Though data on the Northwest Association were not available, there is no reason to expect the situation is any different there. It is abundantly clear that if two-year colleges, technical institutes, and area vocational schools are to receive just representation within the regional associations, there must be a realignment of institutional membership of two-year institutions into separate commissions--commissions which, it is hoped, would ensure adequate representation of those with responsibilities and expertise in occupational education. The dichotomization of postsecondary occupational education between two commissions solely on the basis of whether an associate degree is awarded upon completion certainly is not an appropriate solution to the problem. A restructuring of the regional associations to provide equitable representation for occupational education under a tenable administrative structure is long overdue, and those in positions of responsibility in occupational education should accept no less. Further, the present procedures in which the interactions of the accrediting process are exclusively between an institution and the regional association, completely bypassing state boards of education and state-level officials having overall responsibility for a system's operation, ignore the realities of responsibility and authority of highly centralized state systems. Bylaw modifications are in order to ensure equitable representation of these officials in the power structures of the several associations.

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[1] The New England Association has begun action which will probably result in the formation of a separate commission to accredit occupational education at grade levels 9-14 unless such is offered in a community college or other institution offering college transfer work.

The problem of inadequate and irrelevant standards for the evaluation of occupational education is in part attributable to the problem of administrative structure discussed above. The academic educators on the commissions which accredit four-year colleges have deduced, without benefit of expertise and with very little knowledge of occupational education, that the standards by which four-year colleges are judged are equally applicable to two-year institutions offering occupational education. Aside from the fact that these standards have little demonstrated validity in the assessment of quality in four-year institutions, no recognition is made of the fact that the objectives of occupational education are often entirely different from those of academic education at either the two-year or four-year level. Whereas postsecondary academic education strives to raise standards through highly selective admission practices which ensure highly competent and homogenous groups, occupational education strives to provide opportunities to a broad spectrum of potential students. Whereas academic education places major emphasis upon the academic preparation of instructors, occupational education places emphasis upon relevant previous experience, skill, and expertise in the field taught. Whereas much academic education is directed inward (or upward to graduate school), occupational education is closely aligned to and draws upon the expertise of those who employ the graduates.

These are only a few of the reasons which lead one rationally to the conclusion that occupational education should be judged by standards and evaluative criteria different from those used to assess quality in academic education. These help to explain why the majority of responding state directors of vocational education and directors of two-year college systems indicated a belief that present standards are inadequate and irrelevant. Moreover, to contend, as do the academicians within the associations, that each institution is evaluated in terms of its stated objectives is to acknowledge a lack of understanding of and appreciation for the role of occupational education. Due partly to strong financial support by federal and state governments and partly to the residual role of occupational education--in that it must strive to serve the needs of a variety of people whose needs are unmet by restricted purpose secondary schools and colleges--any institution offering occupational education has a broad obligation to society. Each institution should be evaluated in terms of its effectiveness in meeting this obligation, regardless of whether the many facets of this responsibility are acknowledged in formally stated institutional objectives.

The most alarming finding of the study, which applies equally to the regional and specialized accrediting agencies, is the lack of application of scientific principles and techniques to the evaluative process upon which the decision to extend or deny accreditation rests. Charges were found in the literature adducing undue emphasis upon process to the neglect of product, the use of empirical methods in the development of standards, and a lack of knowledge of the reliability with which standards could be measured or the validity of these standards could be measured or the validity of these standards in predicting quality in the product of the educational process. These charges were amply substantiated in the study. Nowhere in the literature of any of the regional or specialized accrediting agencies was there found evidence of efforts to determine interrater or replication reliability of standards and criteria measurement or a determination of the correlation between process and product variables. It appears fair to say that the evaluative process in accreditation has not advanced one step in terms of principle or technique since its inception. In its present state accreditation has to be considered an art without a vestige of science. With the measurement knowledge and accuracy available in present statistical and psychometric techniques, those responsible for the effectiveness of occupational education should insist that the assessment of occupational education be placed on a scientific basis, and, to that end, the reliability and validity of presently used subjective and empirical standards and criteria must either be demonstrated, or such standards and criteria must be abandoned.

Specialized Accrediting Agencies

Many of the observations and conclusions made concerning the regional associations apply equally to the specialized accrediting agencies, although the problem of specialized accreditation is not nearly so great an issue in public institutions offering postsecondary occupational education as is regional institutional accreditation. With the exception of a few of the paramedical specialities and certain fields of engineering. specialized accreditation is not widely sought by public institutions. The major issue concerninn specialized accreditation is congressional action tying eligibility of public institutions for publicly appropriated funds to the requirement of specialized accreditation. Such an act makes such agencies quasi-legal and representative of the public interest. Yet the study showed that few of these agencies or associations have bylaw provisions which will allow representation of the public interest by persons who have no vested interest in the decisions made or of occupational educators on policy-making boards. This is particularly true of the American Dental Association, the American Medical Association, and the Engineers' Council for Professional Development; to a lesser extent it is true of the other specialized agencies which accredit in the public realm. Notable exceptions to this are the accrediting agencies which accredit in the proprietary sector. Practically all of these have a large component, though never a majority, of board or commission members who have no vested interest in the decisions of the board and who could be broadly conceived as representatives of the public interest. The concept of representation of the public interest on the boards of the regional and professional associations is equally cogent in that they have also become vehicles by which public institutions are made eligible or ineligible for publicly appropriate monies. If these associations are unwilling to make needed changes, then they should refute this responsibility to society and make it clear to Congress that they have no interest in serving societal needs.

The Federal Government

The two major implications of the federal government's role in accreditation and evaluation of occupational education are found in the substantial amounts of funds earmarked for research efforts under various acts and in the activities of the Commissioner of Education, acting under congressional mandate, in the recognition of specialized and regional accrediting associations as arbiters of quality in education and, as such, determiners of recipients of federal funds. Certainly occupational educators should be concerned about the proportion of research funds spent to improve the evaluative process in occupational education and should act accordingly, but the activity of the federal government which concerns a major principle is that of recognition of accrediting agencies. To this time the regional associations and others recognized by the National Commission on Accrediting have been recognized without evaluation, but the newly created Accreditation and Institutional Eligibility Unit in the Bureau of Higher Education has established a timetable whereby each agency currently recognized must undergo evaluation by that unit. The criteria that the Unit will use, as published by the Commissioner of Education, were analyzed in the study; and it is apparent that not all of these criteria are adequately met by the various specialized and regional associations. To this time these organizations have considered themselves completely autonomous and responsible only to their members. One can only speculate about what will happen if these criteria published by the Commissioner are rigorously applied, and recognition is denied some of these associations. Such action could force a consideration of alternatives to the present approach such as the recognition of state agencies, the establishment of other accrediting agencies, or the establishment of federal machinery for nationwide accreditation.

The States

Analysis of data concerning state efforts in the evaluation of postsecondary occupational education added little knowledge of a scientific nature to that already ascertained. Scientific research concerning evaluation of occupational education is as lacking among the states as it is among the accrediting agencies, and apparently the same tacit assumptions are applied to the evaluative criteria used. Many of the states have, however, gone much further in the development of specific evaluative criteria which have some degree of objectivity than have the accrediting associations which are satisfied to use broad and subjectively stated standards or "guides." While only seven states indicated the use of state accreditation, an additional nine have comparable formal programs of institutional evaluation. Also, many other states acknowledged the use of program or curriculum evaluation which, if applied to all programs, easily approaches institutional evaluation. When various factors are considered, it appears that evaluation as practiced by many of the states is equally as good as or superior to that practiced by the regional associations. Certainly their resources and expertise are superior, and their vested interests are only moderately greater than those of the accrediting associations.

In conclusion, the study of accreditation and evaluation of postsecondary occupational education has disclosed many weaknesses and inequities--even injustices. The time is at hand for a complete reformation of so-called "voluntary" accreditation as well as improvement in the techniques of evaluation. If accrediting agencies as they now exist refuse to heed the call for representation of the public interest and the demands of occupational education for equitable representation in policy-making, the adaptation of suitable administrative structures, the development of standards and criteria necessary and sufficient for the adequate evaluation of occupational education, and the application of scientific principles to the evaluative process, then more viable alternatives should be pursued.

ACCREDITATION OF POSTSECONDARY OCCUPATIONAL EDUCATION: ISSUES AND ALTERNATIVES

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Introduction

The title, which was assigned to me for my formal contribution at this conference, reminds me of the announcement included in a church bulletin: "This morning there will be a meeting in the north and south ends of the church. Children will be baptized at both ends."

I am expected to speak about accreditation of postsecondary occupational education in perspective: issues and alternatives. To me this means that I am to baptize you at both ends: the past and the future.

Although there can be differences of interpretation with respect to the past, there will likely be little controversy among those assembled here with respect to the historical developments of accreditation. However, at the other end--the future--there are bound to be differences, strong differences, if for no other reason than that you collectively represent a wide divergence of special interests, organizations and points of view.

In an attempt to be of assistance, let me present my observations with respect to the purposes of accreditation in both the past and the present and conclude with some observations and predications for the future.

The Past

As all of you know, and as Charles F. Ward has so clearly reminded us in his excellent current survey of accreditation and evaluation of postsecondary occupational education, there are three general types of accrediting organizations. These are the regional associations of educational institutions--colleges, universities, and schools--which accredit themselves; the national professional bodies which accredit the programs of study educating and preparing future members of the respective professions; and governmental authorities in some of the states which conduct accreditation--whether it is termed approval, licensing, registering or accreditation--of institutions and/or programs of study. The original purposes of accreditation were not identical for these three general types of organizations.

Original Purposes of Accreditation by Regional Associations

The single most important reason for the founding of the earliest regional associations of colleges and secondary schools was the need to improve the means by which students were admitted from the schools to the colleges--what we now identify as articulation. Colleges were testing students on the basis of different syllabi, a condition which was painful for the teachers and the pupils, especially in a school which might send its graduates to more than one college. Furthermore, some colleges were operating at a level little more than that of a secondary school, and many more colleges were conducting education at both the collegiate and secondary levels.

Following the Jacksonian period and the Civil War and in a period of economic and industrial expansion, education gradually disengaged itself from what we now consider to be the classical tradition. The land grant colleges were increased in number, graduate education was superimposed on the colleges, new fields of study were introduced, and the old criteria of what comprised a good education became untenable. Changes in education were being introduced, although at a much slower pace than we are currently experiencing. The result was a chaotic situation with varying attempts at regularization and standardization.

These attempts included a system of certifying high schools developed by the University of Michigan, the creation of the now defunct New England College Entrance Certificate Board and the still very active College Entrance Examination Board, as well as the Carnegie unit which was devised to serve a very definite need. When the need no longer continued, the concept of the Carnegie unit persisted, and, thus, in time it became much maligned. During this same period four of the present six regional associations were formed in New England, the North Central, the Middle Atlantic and the Southern states.

Concerned with articulation between the schools and the colleges, these regional associations were inevitably and immediately involved in issues relating to standardization of both the institutions and their educational offerings. Accreditation became the primary process by which standardization was enforced. Incidentally, this movement was not limited to education; it extended into business, finance, labor, agriculture and throughout society. In 1907 Woodrow Wilson stated:

> We are on the eve of a period of reconstruction. We are on the eve of a period when we are going to set up standards. We are on the eve of a period of synthesis, when, tired of this dispersion and standardless analysis, we are coming to put things together into something like a connected and thought-out scheme of endeavor. It is inevitable . . . .

Within this context the regional association set up standards and expected the institutions to comply with them in order to attain accreditation. As with the Carnegie unit when it passed its period of usefulness, standardization of education as required for accreditation continued beyond its period of constructive contribution.

Resistance to the approach of standardization led to a massive study by the North Central Association in the 1930's and to the philosophy devised by the Middle States Association in the late 1940's of judging institutions individually in the light of their stated goals. This change was in response to changing philosophies and to the fact that some regional associations were beginning to review for the first time those members which had been permitted to retain their accredited status as long as thirty years without review. "Once in the club, always in the club," was the observation of some educators. The institutions which controlled these associations wished freedom to conduct their own educational affairs as they chose. The philosophy "in the light of their stated goals," appealed to them. We have since learned that this philosophy of accreditation can sometimes be carried to a point of little meaning.

Another factor, often overlooked, which supported the introduction of accreditation was the desire of some of the stronger institutions to have a means of publicly segregating themselves from other institutions which they considered to be inferior and which in some cases were pursuing shoddy or even dishonest practices. This factor has provided a motivation for many institutions to seek the status of accreditation.

Original Purposes of Accreditation by Professional Associations

In a similar manner, this same factor of public identification has provided one of the motivations for members of national professional bodies to support the activities of their societies in accrediting programs of study which prepare the future members of their particular professions. The accomplished professional does not wish either to be associated with or to face undue competition from an unqualified practitioner. One of the ways to protect himself is to support a program of accreditation in which only the minimally adequate educational offerings are given public recognition and approval by his professional body, which, in his view, comprises the only individuals who are capable of judging an adequate educational program for his profession.

The first professional field to undertake accreditation was medicine. Although organized in 1847, the American Medical Association did not publish its first list of approved medical schools until 1906-07. The delay was caused to a large extent by a continued acceptance of the philosophy of laissez-faire and by opposition on the part of many physicians who feared that their own professional competence and educational background would be questioned if the schools where they might have studied were not on the approved list. Publicity following the issuance of the Flexner Report in 1910 accelerated the establishment and enforcement of standards in medical education and the eventual closing of approximately half of the more than 160 medical schools which were in operation in 1906.

From this beginning, accreditation of professional programs of study conducted largely by the national societies representing the professional practitioners has multipled so that today there are several dozen such accrediting organizations, and the number is bound to increase. But more about this later. For the present let me simply recognize that the primary purposes for accreditation of professional fields of study were to help the public identify minimally qualified practitioners by standardizing their education above a minimum level and to protect the practitioners from the competition of incompetent persons.

Purposes of Accreditation by State Agencies

Under whatever terminology it may operate, accreditation is also conducted by a few states, but in no consistent manner. Most states perform either no accreditation or only limited accreditation of educational institutions, public or private. At the other extreme is New York State with its long established Board of Regents which possesses broad powers; it may even suspend the charter of any educational institution if, in its judgment, an institution fails to comply with the state regulations. Regardless of the extent to which the state exercises its responsibilities, each state is assigned through the adoption of the Tenth Amendment to the United States Constitution the privilege of regulating and controlling the education offered within its state borders. Such control is intended to be exercised only for the public welfare, in contrast to accreditation by regional and professional organizations which do operate in part for the benefit of their members.

The Present

Although this is a somewhat cursory sketch of a few of the factors related to the history of accreditation, I have presented this sketch in order to emphasize the purposes which accreditation was originally expected to fulfill. Before speculating about the future let us consider what are its present purposes.

No longer is articulation, or admission from school to college, or college to graduate or professional school, an important purpose of accreditation. Other criteria, such as testing, both objective and subjective, have been developed to preclude the necessity of relying to any great extent on accreditation in admission of students.

In addition standardization is not at present an important purpose of accreditation. In fact, it is not standardization but more flexibility which is needed in education; and there are serious questions about whether accreditation may actually hinder to some extent or at least be used as an excuse for not devising more flexible patterns of education at all levels.

The three purposes for accreditation which I consider to be of current, primary importance are: (1) identifying institutions or programs of study which have attained minimum quality; (2) serving as a complementary function to licensure; and (3) continuing to provide some protection to institutions of reasonable quality from improper competition on the part of institutions of a shoddy or dishonest nature, and protection from inappropriate intrusions by external forces, such as public officials, politicians, and either extreme right or left wing groups attempting to disorient an institution.

There are other functions of accreditation which some persons would consider to be among its purposes, such as stimulating continued improvement. This operation I consider to be an incidental by-product which could be, and is, conducted by other organizations and in other operations just as well, and is not primarily a function of accreditation.

Of these three present purposes of accreditation, the one which is over-riding in importance is that of identifying institutions or programs of study which have attained at least minimum quality. For this purpose alone accreditation should be supported, at least until some other equally good or better method is developed. Not merely do students, parents, employers, guidance counselors, and prospective donors rely initially on the lists of accredited institutions and program of study, but agencies of the federal and state governments are increasingly dependent on such lists.

In this country we have no tradition of, or apparent desire for, a ministry of education or a ministry of finance to issue directives or sets of standards by which educational institutions are expected to operate. Instead we have developed, as has no other country, the art or science, as you prefer, of objective testing, and we employ this method of evaluation quite widely. However, we have not yet considered such testing to be sufficiently infallible that we can rely on its results for a total classification of institutions or programs of study, which classification could be considered reasonably accurate and significant.

In view of these factors, in view of the size of this country and its diversity, as well as the diversity among the types of institutions, and in view of our national reliance on education for a massive proportion of our large population, I predict that we will continue to rely on accreditation in some form as a means of initially identifying institutions and programs of study which maintain reasonable quality. You will note that I stated, in some form. Exactly what form it will take I cannot predict, but I can restate my previously expressed opinion that accreditation will shortly have to go through some major transformations in order to meet the needs of society.

Charles F. Ward has indicated this trend when he identified eight factors which complicate accreditation of occupational education:

1. Failure to determine whether program accreditation, institutional accreditation, or both are at issue.

2. Inability to determine what vocational-technical education includes.

3. Diversity related to the fact that some occupational education programs are part of the comprehensive high school, separate institutes, or the community college program and are supported publicly, privately, or by a variety of proprietary institutions.

4. Recognition that accreditation in America has historically been a voluntary and jealously guarded relationship between an institution and an accrediting agency, which, in the minds of many, is threatened by the involvement of governmental agencies.

5. Allegations that federal funding threatens the traditional freedom of institutions.

6. Unresolved issues of creating fifty state accrediting systems or maintaining existing regional accrediting.

7. Confusion regarding program approval versus institutional approval.

8. Indecision regarding development of additional accrediting agencies or expansion of existing ones to cope with specialized educational programs.

9. Disagreement on accrediting programs at the two-year level.

Dr. Ward's list of factors which complicate the accreditation of occupational education raises a number of issues extending beyond the development and place of such accreditation. They also remind me of the difficulties and protracted delays faced by teachers' colleges and junior colleges in their early attempts to gain recognition and accreditation from the liberal arts oriented and dominated regional associations. However, conditions have changed in the past fifty years, and occupational education will gain acceptance much quicker than, for example, those early junior colleges, which, incidentally, were initially considered to be half a liberal arts college for purposes of accreditation.

Acceptance of occupational education will come much more quickly because, for one thing, the federal funding of such education is now approaching a billion dollars a year. In the second place, although not yet sufficiently recognized generally by educators, the primary purpose of accreditation currently is to serve the needs of society; and one of these major needs is to screen institutions and programs of study for government agencies making grants for educational purposes.

On these premises and with this background I offer some conjectures for the future.

The Future

It is a reasonably safe prediction that the federal government will in the future be more prominent in accreditation than it has been in the past. I am not implying that government agencies will themselves conduct accreditation; I am indicating that they will exert more influence in the philosophy, the structure and the process.

You will recall that the Veterans' Readjustment Assistance Act of 1952 charged the United States Commissioner of Education with the responsibility of publishing "a list of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of training offered by an educational institution." To fulfill this assignment the Office of Education established criteria or standards which accrediting agencies were required to meet in order that their respective lists of accredited institutions might be accepted. The enforcement of these criteria for accrediting agencies was far from severe until the past few years when the Accreditation and Institutional Eligibility Staff was created in the U. S. Office of Education. With the assistance of an Advisory Committee this Staff is placing appropriate emphasis on the needs of society as it reviews accrediting agencies for initial recognition or renewed recognition.

Concurrent with these developments, all accrediting agencies are finding that their present sources of funds are insufficient for them to meet not only their present obligations but also the added responsibilities expected of them. (Parenthetically, the costs of the Marjorie Webster Junior College case are placing a large financhial burden on the Middle States Association of Colleges and Secondary Schools.) The accrediting agencies are being subjected simultaneously to criticisms from their members for increased assessments and dues for accreditation and from non-members for not thoroughly testing and validating the criteria by which they conduct their accrediting procedures.

In view of these and other factors, I visualize that in the future the federal government, possibly through the Accreditation and Eligibility Staff, will be contracting with selected non-governmental organizations to perform the functions of accreditation, the results of which will meet the governmental needs of identifying institutions and programs of study of reasonable quality. If this source of additional financing for the financially hard pressed accrediting agencies develops, I further predict that as part of the contract to receive funds these organizations will be expected to adopt policies which will cause them to revise and broaden their philosophies, review their criteria in a more scientific manner, and alter their structures.

Philosophies of Accrediting Agencies

Because of their origins and because of their historical developments, accrediting agencies representing either institutions or programs of study have naturally developed philosophies that are congenial to their respective constituencies. The general public has not been one of their constituencies, and, therefore, the interests of the public have been of no more than secondary importance. Examples of this fact can be demonstrated by the following questions.

> Is the quality of the education offered by an institution related to whether the institution grants a bachelor's degree, or any degree?
>
> Has it been proven that the quality of education is directly influenced by the method in which the institution is financed; that is, by non-profit orientation or profit incentives?
>
> What is the social justification for granting accredited status to programs of study offered in some types of institutions but refusing to grant such recognition to similar programs in other types of institutions?
>
> What is the social justification for institutions in some regions of the country being eligible for accreditation and the same types of institutions in other regions being considered ineligible?
>
> Does accreditation of an institution guarantee that all of its programs of study are operated above a minimum level?

Other questions could also be presented, but these are sufficient to indicate that changes in philosophy must be introduced and adopted if the accrediting agencies are to meet more adequately the needs of society. Furthermore, this last question aims at the heart of one of the conflicts between organizations which accredit institutions and those which accredit programs of study.

Criteria Employed by Accrediting Agencies

With all of the money and effort expended in the development of tests and their applications and with all of the studies and scientific research sponsored in this country, especially by educational institutions, it is noteworthy that our accrediting agencies have encouraged such little analysis of the effectiveness of their activities and the validity of their criteria. There has been only one extensive study of accrediting criteria and evaluation with which I am familiar; namely, the study sponsored in the early 1930's by the North Central Association of Colleges and Secondary Schools, the results of which had little apparent effect on the conduct of accreditation.

As accrediting agencies are required to give primary attention in their accreditation to the needs of society, they will be forced to justify the validity of their own criteria. No longer will the public accept the development of requirements for accreditation only by those who are most directly concerned with the results; that is, the officials of the institutions or programs of study under review.

This observation leads to the issue of structure about which I anticipate there will be strong differences of opinion because, as I stated at the beginning of this paper, you represent varying points of view and different organizations with varying interests.

Structure of Accreditation

At the center of all issues in accreditation is the conflict over structure or control. The genesis of the National Commission on Accrediting was the issue of control, or as I have written, a struggle over standards.

The institutions, especially the liberal arts colleges and universities and now the junior colleges, wish to control the regional accrediting associations through their administrative officials. The members of the professional societies wish to control the accreditation of the programs which prepare the future members of the respective professions. And it must be noted that the number of such specialized groups wishing to perform accrediting functions is rapidly increasing and will continue to do so for many social reasons which would cause distraction if they were enumerated at this time.

In all of these examples, where is the public represented? Let us take the regional associations as an example. It would be interesting to make an analysis of the composition of the boards of directors or executive boards and of the commissions responsible for the accreditations of post-secondary institutions. I anticipate that the results would show that the total composition is, with a few exceptions, white, middle-aged or older males who are presidents or serving in other administrative positions of colleges or universities, with a sprinkling of some secondary school administrators.

If this assumption is reasonably accurate, should one expect that occupational education can be accepted and evaluated with judgment by the regional assocations in a manner adequate to meet the needs of society? The history of these associations would indicate a lack of recognition of the broad concepts of social responsibility, in contrast to concerns for the institutions which already are members.

On the other hand, does this mean another national organization to accredit specialized fields of study, an organization whose control would be in the hands of educators concerned only with occupational education? The welfare of society would argue against this development if for no other reason than it would add further to the already excessive fragmentation of educational organizations.

Theoretically, at least, the regional associations have it within their power to take the lead in resolving the issues which Dr. Ward listed as complicating the accreditation of occupational education. However, they are unlikely to bring a constructive resolution to the scene without a drastic change in their structure and basis of control. To accomplish this major revision they will need further nudging by such groups as the Accreditation and Eligibility Staff of the United States Office of Education and the National Commission on Accrediting. They also will need simultaneously to realign their geographical boundaries in order to provide for more effective administration.

If such changes are not initiated in the near future, we could witness the Accreditation and Eligibility Staff's turning for accrediting services to some newer organization, such as the Education Commission of the States. Such a move should not be considered revolutionary, since under the United States Constitution the legal authority to regulate education rests with the states. There can be no doubt of the primary obligation of the states to consider the public welfare.

THE AMERICAN VOCATIONAL ASSOCIATION AND THE DEVELOPMENT OF STANDARDS FOR OCCUPATIONAL EDUCATION

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Some years ago, the AVA learned that some institutions were being accredited with little attention paid to the quality of the vocational education programs offered in them. This was distressing because some of these institutions claimed to be comprehensive, yet they were not. Then, as now, State Boards for Vocational Education approved local programs to receive federal funds. All programs are conducted in accordance with the provisions of the State Plan for vocational education. Some have looked upon this as federal control. However, minimum standards are applied by the states in order for local programs to be eligible for state and federal funding. As the national program has greatly expanded since the passage of the Vocational Education Act of 1963, it has become difficult for states to supervise all of their programs. The situation will continue to be complicated as further expansion takes place under authority of the Vocational Education Amendments of 1968.

In response to the growing need for trained persons at levels above the skilled worker, Title VIII of the National Defense Education Act of 1958 authorized programs for the training of highly skilled technicians. This further amplified the concerns of the AVA. Junior and community colleges began to accept more responsibility for vocational-technical education, but they were reluctant to welcome the same state supervision that secondary schools had been accustomed to over the many years. In some states separate boards for postsecondary institutions were established or utilized. These frequently requested State Boards for Vocational Education to fund new programs with no strings attached. However, State Boards for Vocational Education are the sole authority for the administration of these programs.

Understandably, therefore, the AVA was concerned about programs being conducted without meeting established standards. These programs might reflect on the ability of the federal-state cooperative endeavor to meet the needs of youth and adults and of employers for the training of highly skilled technicians. At the same time, there was observed a proliferation of effort in accreditation by specialized agencies. This has continued to expand.

The first organized effort of this Association, about eight years ago, was to call together a group of educators from institutions which offered vocational-technical education in postsecondary programs. Also invited were representatives of specialized accrediting agencies. At that time it was suggested that the Board of Directors of the AVA request the American Council on Education to make a study of the nature and extent of vocational-technical education at the postsecondary level. Subsequently, the American Council employed Dr. Grant Venn to conduct such a study. His work resulted in the publication titled Man, Education and Work.

The report of the panel of consultants appointed by the Secretary of HEW at the request of the President of the United States and the legislation which followed, the Vocational Education Act of 1963, gave further impetus to vocational-technical education at the postsecondary level. This, in fact, was one of the four purposes for which federal funds could be expended. This statute also stimulated further development of the area vocational education school concept which originated with the National Defense Education Act. The area schools took several forms: (1) some were at the secondary level in which students from a number of high schools devoted part of a day, week or other period to vocational instruction in an area school; (2) some were strictly postsecondary in nature where all students who were admitted had completed high school; (3) some admitted both high school graduates and dropouts. This multiplication of programs at various levels created an awareness of the need for some appropriate accreditation of institutions and programs. This means that criteria for progression which are realistic in relation to the nature of vocational-technical education and its objectives must be developed and accepted by those associations and agencies which would accredit vocational and technical education.

The AVA has been asked by the regional associations and the National Commission on Accrediting to undertake the development of guidelines for criteria, standards, and procedures for the accreditation of vocational-technical education. The AVA, strategically the professional vocational and technical educational organization with established and working relationships in all areas of vocational-technical education, has accepted this responsibility.

The AVA Board of Directors committed itself to the development of solutions to the problems which currently exist. In this connection, a proposal for research titled National Study for Accreditation of Vocational-Technical Education was submitted to the U. S. Commissioner of Education for support through authorization of the Bureau of Research of that office. This proposal was approved in June, 1969, and activity leading to its implementation commenced about November 1, 1969.

The following specific and immediate objectives are primary to this study:

1. To develop basic statements of criteria of common aspects of of vocational and technical education programs at all levels and settings of instruction for purposes of accreditation.

2. To formulate an accreditation model for the use of accrediting organizations in program and institutional review and investigation.

3. To construct principles and guidelines of appraisal into a functional guide for use in self-study and self-evaluation as a most desirable and sustaining aspect of educational improvement which is a portion of the formal accrediting process, but not explicit to it.

4. To afford an opportunity to field test criteria and a functional accrediting procedure under actual professional operational settings and conditions with the cooperation of the accrediting community and school practitioners.

5. To establish a communication medium coordinated with periodic dissemination of interested professionals in agencies, organizations, business and industry, and the evaluating and accrediting community to implement voluntary staff self-appraisal and accreditation as vehicles for the on-going improvement and positive function of vocational and technical education in the lives of American youth and adults.

A system of accreditation which commands confidence will enable the nation to make more effective use of its resources in vocational-technical education. Without such a system, institutions with superior offerings often suffer because judgments regarding enrollment and support tend to be based on types or classes of institutions. A comprehensive program of accreditation will tend to drive poor programs and unscrupulous operations out of business or force desirable and necessary changes in their programs. Higher quality in both the proprietary and public sectors will result, and the nation's skilled manpower will increase.

Accreditation will facilitate the transfer of credit among vocational institutions and the awarding of credit for previous training. It will also serve employers who may have a knowledge of programs in their immediate area but who have no means of determining whether a prospective employee has been enrolled in a program of quality at a distant location.

The use of a common set of criteria, evaluation procedures and standards will produce wider understanding among vocational educators as to their role in American education. A consensus on objectives, purposes, and methods will also result. It is hoped that the findings of this study may receive wide acceptance and use.

The first phase of this project was completed. It consisted of developing an acquaintance with persons prominent in the field of accreditation, the gathering of instruments currently being used for evaluation for all purposes, and reexamining the results of research studies, historic documents, and other papers pertinent to the development of an understanding of the whole field of accreditation as it relates to vocational and technical education. The staff has acquired nearly 500 items of documentation in relation to this. In addition, Dr. Charles F. Ward of North Carolina State University has generously loaned the AVA the documentation which he acquired in the course of his study.

We have developed a statement of work activities and a time flow chart which serves to guide us as we move forward through the several steps which are called for in the project. The present step is the analysis of materials on hand, in order to develop some suggested standards which may be applied for evaluation of institutions and programs. Shortly to start and running concurrently are the development of criteria and procedures which will be useful in measuring the extent to which standards are met in the evaluative process. Models will be constructed and field tested following this activity. Models will be adjusted, and the results of these steps will be widely disseminated.

As an important part of our procedure in developing the several steps in this project, it is anticipated that the greatest possible involvement will be effected so as to include members of both the vocational-technical education and accreditation communities, as well as the concerned agencies, associations, and institutions. Only by participation can it be hoped that acceptance may be gained of the product of this study.

As a result of study and conversations up to now, the staff prepared six guidelines for its own use in the conduct of the study. These are not at all intended to be used for program evaluation or for any aspect of the accreditation process; rather these are guidelines which will be posted throughout the office, to lead us to a successful conclusion. I should like to quote these:

1. Accreditation should promote accountability and, toward that end, should be based on measurement of the product as well as of the process.

2. Accreditation should encourage the collection of data about both process and product and should encourage and provide assistance with research into the relationship between product success and process factors, thus utilizing the accreditation process to put the educational process itself on a more scientific footing.

3. Accreditation must continue to be in terms of the objectives of the institution or program, but those objectives should be so stated as to permit measurement of product success.

4. In line with item 3, objectives should be stated in such manner as to permit employers and other institutions to know what to expect of people who have completed any given program.

5. Accreditation should facilitate interchangeability of educational requirements, thus increasing freedom of movement up and between career ladders and eliminating any necessity to repeat education in order to advance in an occupational field or to change fields.

6. Accreditation should be an educational process aimed at improvement of institutions and programs as well as a means of identifying and certifying to the public those institutions and/or programs that meet minimum standards. Accreditation should be to an institution and/or program what education is to the individual.

The guidelines aim to reflect newest thinking in accrediting circles and to permit answers to criticisms such as:

1. Education is the only system that blames the product for its own failure. (Accountability)

2. Accreditation as presently practiced lacks validity and reliability. (Scientific basis)

3. Accreditation as presently practiced focuses on what may be irrelevancies. (False assumptions)

4. Accreditation tends to regiment, limit innovation, and institutionalize outmoded patterns. (Stagnancy)

At present we plan to call a small group of consultants to our Washington office for two days to review some materials now under preparation which will reflect our analysis of the kind of standards which are now in use by the several associations and agencies charged with the responsibility of accreditation. We hope these will be reconstructed so as to provide for improved validity, objectivity, and reliability. We propose to discuss some brief statements of criteria which are suggestive of those which might be developed in more extensive detail and to prepare some statements of procedure which would be useful in the utilization of instruments growing out of this study. The work developed by these consultants will then be presented to the Steering Committee of this project at its next meeting in mid-July. At that time we hope to obtain advice and suggestions from members of that Committee for the immediate next steps.

THE COMMUNITY JUNIOR COLLEGE APPROACH TO SPECIALIZED PROGRAM ACCREDITATION

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Washington, D. C.

My assignment to discuss with you matters of specialized accreditation in the field of occupational education has posed a rather difficult task for me. In the first place, whatever one says concerning any kind of evaluation or procedure for accreditation of programs or personnel in any educational field can very possibly become suspected of bias. With the very rapid growth of the many occupational or career programs in postsecondary institutions in this country during the past ten years, the whole problem of specialized program accreditation has mounted an increasing concern for better and more effective ways of evaluating and judging the educational institutions' work. Another reason for difficulty in discussing this whole matter with you lies in the present fluidity of the whole problem--positions and points of view are changing so rapidly that what I am indicating to you today may not be really as true tomorrow.

My presentation today will center most directly on the area of accreditation. The multi-faceted issues of licensure and registry, especially as these relate to allied health programs, is another concern altogether. I think we should realize that we are really talking about three different areas of concern. Accreditation for the most part focuses on the program and its institutional setting. Licensure and registry focus upon the competency and the ability of the individual coming out of a program and an institution to perform the tasks for which he has been prepared in the educational program. Licensure is generally a responsibility of the individual state. The prospective worker must pass licensure examinations and must be tested in his competency and skills. Generally registry is the responsibility of professional groups representing the various occupations and representing the employers of personnel, and registry of the individual usually confirms that the program in which he received his education and preparation for work should enable him to perform competently and well. Examinations and tests are usually a part of registry also.

Requirements for registry differ from one professional group which administers the registry to another. Requirements for licensure, even for individuals in the same occupation, may differ from state to state. For information concerning the exact procedures and the requirements for licensure, you should communicate with the state board for the occupation in your state; for registry you should communicate with the national office of the professional organization registry.

The concerns of accreditation, therefore, will be the emphasis of our presentation today. Accreditation has long been a part of the educational process, and the principle of accreditation was developed by educational institutions themselves. In the old Elizabethan language, we in the educational institutions, with the increasing proliferation of accreditation demands and the inconsistency developed in procedures, find ourselves "hoist with our own petard." Accreditation, of course, is simply another way of saying that we are pronouncing judgment on the effectiveness and the quality of courses and programs and the product which comes from them. As the demands of special accreditation grow, educational institutions are becoming increasingly restless and hostile to the current methods, approaches, and procedures. Almost all of our educational institutions are subject to regional accreditation from their regional accrediting associations. Many feel that additional specific program accreditation is duplicative; costly in terms of money, time, and effort; and, because subject accreditation is largely based on a set of principles quantitative in nature, not really exercising very valid judgment. In other words, educational institutions are questioning very seriously, not only the necessity of program accreditation as it is now administered; they are questioning even more sharply its cost, its approach, and its basic principles.

Our particular interest is in the field of occupational education and training programs in our community junior colleges. The matter of accreditation of such programs becomes somewhat complex and certainly more important because the degree of competency and ability of the worker coming out of our programs to perform and to exercise effectively and well his direct functions and skills reflects directly on the community college and its standing in the community.

I am perfectly aware, since I have had some role to play in its formation, of the resolution officially approved by the Board of Directors of the American Association of Junior Colleges on January 4, 1967. The resolution in its entirety reads as follows:

> The Board of Directors of AAJC reiterates its position statement of August 26, 1964, to the effect that "regional accrediting associations should bear the primary responsibility for accreditation of community and junior colleges. These regional associations should examine and reformulate where necessary their procedures and policies so that they can evaluate total programs of community junior colleges."
>
> AAJC fully supports the policy statement forwarded on November 17, 1966, from the National Commission on Accrediting office which emphasizes the central, important role of the regional associations.
>
> Further, AAJC offers its full cooperation in assisting professional agencies and the regional associations in

their respective and combined efforts to assist community and junior colleges to strengthen and maintain the high quality of curricular programs.

The Board expresses its appreciation to the NCA for its effective efforts for the improvement of junior and community college accreditation procedures and policies and for its work on behalf of all education.

I think one point should be made very clear. Nowhere in the resolution is there a denial of the importance of accreditation, or even of program accreditation. The focus of attention is upon the method and procedure for evaluating programs and their product. It should be pointed out that the strongest justification for the accreditation of programs is the protection of the employer and the product or service with which he deals.

As we turn to a more specific discussion of some of the current trends in the accreditation process, I would call your attention to several of the professional groups that are attempting to bring unity and consistent procedure to the accreditation of programs. The American Medical Association is one; the American Dental Association is another; the National League for Nurses, modifying their original procedures and methods of accreditation, is a third. Others are in the areas of engineering and science, such as EPDA, or in commerce and business. Of course, there are many agencies and professional groups representing specific programs that are not all related to these larger professional organizations. Let me use the American Medical Association as an example of some of the current trends in accreditation. Again, I would like to precede this by repeating the justification for accreditation; in these areas of health and medical education programs, the physicians need to be very sure that allied health workers have the education necessary to prepare them to accept the increasing tasks being delegated to them by physicians.

In addition to four baccalaureate programs (for medical record librarian, medical technologist, occupational therapist, and physical therapist), physicians have been concerned with sub-baccalaureate educational programs for decades. At the request of the others concerned, the American Medical Association House of Delegates has adopted Essentials for sub-baccalaureate educational programs for nine allied health occupations: radiologic technologist, medical record technician, inhalation therapy technician, cytotechnologist, certified laboratory assistant, radiation therapy technician, nuclear medicine technician, medical assistant, and orthopedic assistant. A request for National Commission on Accrediting and Office of Education recognition of the accreditation for baccalaureate level educational programs for the nuclear medicine technologist is pending. Essentials for the histologic technician are now before the AMA House of Delegates.

The AMA Council on Medical Education is accrediting a significant number of educational programs at the sub-baccalaureate level in educational institutions. At their March meeting in Seattle, the Council on Medical Education accredited sub-baccalaureate programs in junior colleges and lower divisions of colleges and universities for the following fields: certified laboratory assistant, cytotechnologist, medical record technician, and radiologic technologist. Fifteen programs were accredited in March, 1970. The Council's Directory of Accredited Programs includes the following sub-baccalaureate programs in educational institutions as of September, 1969: certified laboratory assistant, 52; cytotechnologist, 5; inhalation therapy technician, 28; medical record technician, 13; and radiologic technologist, 401.

Junior colleges which request accreditation are being surveyed and accredited.

1. In September, 1969, the AMA Council on Medical Education adopted a formal statement to reaffirm its support for junior college programs in allied health and the Council's willingness to accredit such programs.

2. Routine AMA staff work includes serving on survey teams to review junior college programs for the medical record technician. All but two of the programs accredited by the Council on Medical Education for MRT are in community/junior colleges or technical schools.

3. The newly adopted Essentials for medical assistants are concerned solely with junior college (or lower division college) programs, and all schools accredited to date are in junior colleges.

4. The Essentials for the certified laboratory assistant include this statement: "Acceptable schools for training certified laboratory assistants may be conducted by approved medical schools, hospitals, acceptable laboratories, junior or community colleges, and technical-vocational schools suitably organized in accordance with present educational standards."

5. Inhalation therapy survey procedures have been reorganized primarily to meet the demand by junior colleges that their inhalation therapy programs be accredited.

6. New Essentials currently being drafted are primarily concerned with junior college (or lower division college) programs.

A new standard format for AMA Essentials has been adopted as a guide in revising all existing Essentials as well as drafting new Essentials. The standard format specifies that junior colleges be listed as acceptable for sub-baccalaureate educational programs.

Most of the educational programs for allied medical occupations are in hospitals rather than in colleges and universities.

It is planned that the second edition of the Directory will include the Essentials, lists for each of the occupations, and the annual report, as well as the consolidated list of all AMA-approved allied health educational programs in each institution.

Here is the way in which one professional organization is moving. Quite recently I met with a small group of people from the American Medical Association, the National Commission on Accrediting, and the U. S. Office of Education to discuss the issues and concerns of accreditation in the allied health field. This group, discussing informally the problems that so concern us with accreditation, proved to be a perceptive and far-seeing committee. I would hope that you in this audience, concerned as you are with the accreditation process and procedures for occupational education programs, will give the same depth of attention and concern to accreditation as it affects your institutions as did this committee as it looked at these problems generally.

As a kind of summary of this brief presentation to you, I would like to present to you some ideas that I hope will stimulate your own thinking and will be helpful to you in understanding the total process of accreditation. I know that you are aware that I have identified some problems and issues but have done nothing to give you solutions to them. I cannot provide the answers to these problems. I may even have made more obscure some of the bases for consideration and thought. Hopefully, I have brought you some information and some clarification. With these preliminary statements, let me now make my comments for your own thinking.

Some kind of program evaluation and judgment of quality is going to be needed concerning occupational education programs. The professional and employer leadership in career education is not going to abbrogate what it considers to be its prime responsibility in exercising quality judgment on the people who will be a part of the manpower teams in industry, business, engineering, public service, or health service. I am convinced, therefore, that any absolute denial of program accreditation in the occupational fields is a futile and useless exercise.

If we accept, therefore, the proposition that program evaluation is a necessary and good thing in these programs, or at least that it is with us now, we focus our attention on the most effective procedures and methods for judging quality and on an acceptance of procedures and methods that will affect our institutions with the least cost of time, money, and effort while offering ways to strengthen and improve programs. The procedures and methods of accreditation should work to the advantage of educational institutions and not be a principle of "policing" educational programs.

I submit that any kind of accreditation developed anywhere should be voluntary and I hope nongovernmental in nature. I also submit that one of the ways in which we may find an acceptable accreditation procedure and method for various programs would be in the unified accreditation approach. This idea of unified accreditation is the basis for the AAJC Board of Directors resolution. It was suggested in the resolution that regional accrediting bodies have prime responsibility for program accreditation where needed or required. It could very well be that another body with the authority and the means to act could become the unifying force in accreditation. You and I know very well that our institutions cannot live with a procedure of specialized program accreditation that would call for a number of separate groups to come on our campuses, each requiring long preparation of survey materials and various other informational gambits, each consisting of three to seven members of the accreditation team--all of whom must be paid expenses and honorarium, each consuming several days of program time, and each making its own unique demands and requirements on administration, faculty, and students. No institution can spend the time, the money, or the effort for this kind of wasteful, duplicative, and meaningless accreditation.

If there can be a unity brought into the whole procedure of evaluation so that accreditation can be accomplished through one body or through only a small number of agencies and so that application can be made to developing programs, it is my belief that our institutions could find this an acceptable part of the educational program.

In closing, let me urge that you make use of the sources now available to learn all you can about current accreditation. Such information can be obtained by writing the National Commission on Accrediting or the American Association of Junior Colleges. As a conclusion to this presentation to you, I would appreciate receiving from you any suggestions or ideas concerning acceptable ways for professionally judging and evaluating the quality of our programs and the student product which comes from them.

A HOLISTIC APPROACH TO EVALUATING OCCUPATIONAL EDUCATION

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Introduction

During the preparation of this paper, and now during its presentation, there has been one assumption which has served as a guide. That assumption is that the authors and all of the participants assembled at this meeting partake of a common mission which is to contribute to improving the quality of occupational education for all persons and groups in each community in this nation. The assumption is grounded in the firm awareness that the aim of improving occupational education is embedded deeply in the fabric of American education, and attested to by the fact that every set of educational aims formulated in this century has included the preparation for occupational proficiency as one of its major aims. Unfortunately, however, the attainment of this aim has left much to be desired. According to the National Advisory Council for Vocational Education, only one youth out of every four in secondary schools was enrolled in a program of occupational education during 1966. This was true despite the fact that only one youth out of every six will achieve a baccalaureate degree. Even granting the rapid growth of postsecondary occupational education programs, only four percent of the youths between the ages of 18 and 21 were enrolled in these programs, and occupational education programs for adults enrolled in a scant three per cent of the adult population during 1966.[1] These data relate only to the quantity of occupational education. The quality of occupational education, its assessment and control, though related, are entirely separate issues.

The forces represented at this conference have within their authority the power to improve occupational education to the extent that appropriate programs may be provided for all persons who need to be prepared for employment in occupations not requiring the baccalaureate degree. They also have the power to insure that the training received in these programs will be relevant, appropriate, and consistent with the occupational demands of society and the specific attribute structure of the individual. At the same time, the forces represented here have the obligation to the American public to ascertain that such education will be efficient in terms of costs and effective in terms of outcomes. To achieve these goals, all forces must work in harmony. We cannot tolerate the luxury of isolation and independent action. It is for that reason that the Center for Occupational Education has worked closely with the Southern Association of Colleges and Schools in the development of its program to improve the quality and quantity of occupational education for all persons in the 11 southern states served by the Association. But neither the interests of the Center nor those of the Southern Association are restricted to regional boundaries. The improvement of programs and the assessment of the effects of these programs constitute the major problem in occupational education in the entire nation today.

There is no question that if the goals of occupational education are to be attained, the resources of the accreditation agencies must be enlisted toward the attainment of these goals. One of the primary purposes of any accreditation program is the upgrading of education. If this prupose is not always stated explicitly, it does stand revealed implicitly in the by-laws of agencies such as the regional accrediting associations. Selden listed this educational upgrading among the major purposes of accreditation, referring to it as "stimulating institutional self improvement." He also noted that the other purposes of accreditation, admissions and the maintenance of academic standards, were becoming less important in relation to stimulating improvement.[2]

The responsibility for improving the quality and quantity of occupational education and the maintenance of quality control is not the sole province of the accreditation agencies. Contributions to improvement come from many areas and agencies, among them the U. S. Office of Education, the American Vocational Association, and state and local educational agencies. But the regional accreditation agencies have long been recognized for their prestige and power, and their approbation has been recognized as a hallmark of quality. If there has sometimes been a difference of opinion between the regional accrediting agencies and occupational educators over what constitutes "quality," perhaps one reason might be that the goals of occupational education have not been communicated sufficiently well.

The primary purpose of this paper is to present a holistic approach to the implementation of occupational education. Although this conference is directed primarily toward postsecondary occupational education, it is not possible to view this segment, or any segment, in isolation from other levels of education without the observer's resultant myopia obscuring the relationship to other programs. Concomitantly, occupational education has been isolated too long from general or academic education, whereas in reality the educative process is continuous and integrative. Hence, there are three premises which guide the holistic approach to occupational education presented in this paper. First, occupational education is viewed as a continuous, rather than as a discrete process. Second, occupational education is considered not as a separate entity, but as an integral facet of the total educative process. Finally, occupational education is viewed as having a significant interface with both society at large and the national labor market, generally referred to by occupational educators as "the world of work," and it must be able to provide the individual with the skills and knowledge which will enable him to interact effectively with both.

In presenting the holistic approach, we shall examine the national goals for occupational education, present a model for education for occupational proficiency, interrelate this model with a model for program planning and evaluation, and then point out the implications of the holistic approach for accreditation and program implementation.

The Model for Education of Occupational Proficiency

The Philosophical Basis for the Model

The national goals set forth by Congress in House Report 1647[3] and Senate Report 1386[4] of the 90th Congress, 2nd Session, are manifested in the Vocational Education Amendments of 1968. These national goals for vocational education, as expressed by Congress, are both explicit and implicit. The explicit goals are stated in the Declaration of Purpose of the Vocational Education Amendments of 1968:

> It is the purpose of this title to authorize Federal grants to States to assist them to maintain, extend, and improve existing programs of vocational education, to develop new programs of vocational education, and to provide part-time employment for vocational training on a full-time basis, so that persons of all ages in all communities of the State--those in high schoo, those who have completed or discontinued their formal education and are preparing to enter the labor market, those who have already entered the labor market but need to upgrade their skills or learn new ones, those with special educational handicaps, and those in postsecondary schools--will have ready access to vocational training or retraining which is of high quality, which is realistic in the light of actual or anticipated opportunities for gainful employment, and which is suited to their needs, interests, and ability to benefit from such training.[5]

The implicit goals may be inferred from the reports of Congress. The Senate Report stated that "The immediate motivation for the 1963 Act was the high level of unemployment among untrained and inexperienced youth. Longer term criticism alleged a failure to change occupational emphases in keeping with an increasingly sophisticated technical economy. More dimly recognized, but implicit, was the growing need for formal preparation for employment."[6]

The House Report stated, "The vocational education legislation that we report today includes many features which will assist our society in that task of becoming a greater and more productive nation."[7]

It seems clear that Congress intends that opportunities for training be provided for all persons who can profit from such training for whom a college education is not appropriate, within the ability of Congress to provide the necessary funds. And, further, it seems clear that Congress intends that this training for subprofessional occupations will be at a level of quality equivalent to that offered in schools for students who are proceeding toward college. The goals of vocational education which relate to adequate and appropriate preparation for employment are closely related to the national goals of alleviating poverty, minimizing unemployment, maximizing the productive contribution of each member to society, and maintaining a healthy dynamic economy. The implicit goals themselves may be stated in terms of a debt. That is, vocational education owes to each person who is capable of participating in the economic productivity of the nation an opportunity to obtain the necessary skills and knowledge enabling him to enter into and progress in a career based on the occupational demands of society and the attribute system of the individual.

These explicit goals and implicit goals should be recognized for what they are, not simply abstract notions, but rather a mandate from society, expressed through the medium of national legislation, which is intended to guide our direction. These goals established a national priority which all of us in occupational education should recognize and keep firmly in mind.

The goals of contemporary programs of occupational education are the product of a series of developments. The process of this development began in this decade with the report of the Panel of Consultants on Vocational Education,[8] subsequently manifested in the Vocational Education Act of 1963, reexamined by the Advisory Council on Vocational Education,[9] subsequently redefined in the House and Senate Reports, and remanifested in the Vocational Education Amendments of 1968.

A Model for Education for Occupational Proficiency

In order to examine occupational education in relation to national goals, we have developed a model for education for occupational proficiency. This model has been designed to serve as an initial step in translating national goals relative to occupational education into reality. The model is presented as a preliminary report. Refinement is required prior to its implementation. Not only is work required for the implementation of the model, but work is also required in order to determine the strategies through which the model may be introduced into local educational agencies.

The generic basis of the model is the concern expressed by Congress for fuller and more complete attention to the needs, interests, and abilities of the individual in the development and implementation of expanded programs of occupational education. The model goes beyond that which has traditionally been considered vocational and technical education, although vocational and technical education as it has been operated in the public school system is an essential element of the model. The model considers the totality of preparation for employment within the school system. It is termed "a model for education for occupational proficiency" because it is based on the assumption that most if not all education, that is, most if not all curricular experiences provided under the direction of the school, are or should be relevant to preparation for gainful employment. Where the individual receives specific education for employment may be a function of time and place. It may occur in the secondary schools, in the postsecondary schools, in colleges and universities, or in adult classes. The model does not deny that much preparation for occupational proficiency is provided outside the school system; however, this model is restricted to the school system.

The model is depicted schematically in Figure 1. Figure 1 essentially consists of two systems--the school system and the occupational structure or work system. The occupational structure system overlaps the school system to denote that persons may be in school and working simultaneously. The input into the model is the individual, and he enters the model concomitant with his entrance into the school system. The model shows that the entrant is conditioned by the social familial value system which provides his background and the basis of the individual attributes which must be modified through the school system.

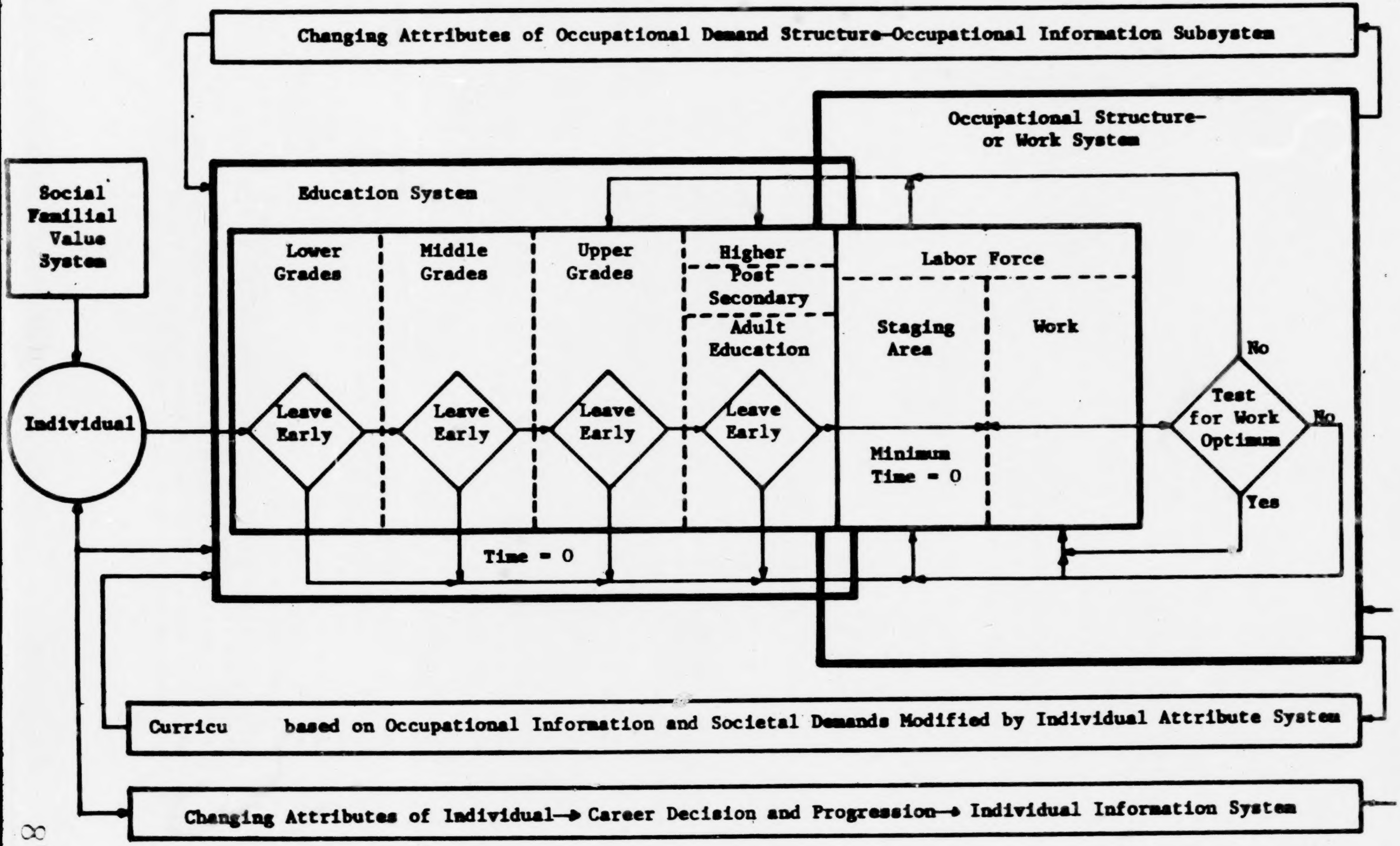
The school system is subdivided into four levels. The lower grades are analogous to elementary school, the middle grades are analogous to junior high school, and the upper grades are analogous to senior high school. Postsecondary and adult education are beyond or external to the three lower levels. The broken lines which separate each of the levels are intended to denote a high degree of flexibility and articulation between and among the several levels of the school system. No level is considered terminal.

To function effectively, the school system must retain the individual to that point in time at which he can leave the school system and enter the labor force with maximum benefit to himself and the highest possible degree of productivity to the social and economic structure of society. Within the occupational structure or work system the block labeled "labor force" represents the number of persons available for employment at any given point in time. The labor force may be thought of as a staging area into which the product of the school system is placed prior to obtaining employment in the world of work, as well as the component of the population that is working. T[illegible] individual who completes the system, including higher education or postsecondary schools, enters the labor force upon the completion of his formal education. Decision points are placed on the lower base line of the school system to denote that the individual may decide to leave the system prior to completion of a public school education program. Once the individual decides to leave the system, he immediately enters in the labor force, except in special conditions such as illness, induction into armed forces, or, in the case of girls, pregnancy. Technically, the model does not distinguish among individuals who leave the school system at the completion of high school or who enroll and drop out of a higher education or postsecondary program, and individuals who leave school prior to completion of high school.

The model is highly individualistic, and some students who have had access to high quality vocational training in the upper grades may have the necessary skills for entrance into the labor force or into an

FIGURE 1

A MODEL FOR EDUCATION FOR OCCUPATIONAL PROFICIENCY


Changing Attributes of Occupational Demand Structure—Occupational Information Subsystem
Occupational Structure—or Work System
Social Familial Value System
Individual
Education System
Lower Grades
Middle Grades
Upper Grades
Higher Post Secondary
Adult Education
Leave Early
Leave Early
Leave Early
Leave Early
Time = 0
Labor Force
Staging Area
Work
Minimum Time = 0
Test for Work Optimum
No
No
Yes
Curricu based on Occupational Information and Societal Demands Modified by Individual Attribute System
Changing Attributes of Individual→ Career Decision and Progression→ Individual Information System

apprentice program. Some individuals may terminate their educational program before completing higher education or postsecondary school programs and have adequate skill development for entry into employment. Other individuals may have completed high school, enrolled in higher education, left higher education before completion, and entered the labor force without having developed skills which will enable them to enter into employment at a level commensurate with their attribute systems. Youths who leave school prior to acquiring salable skills enter the labor force without marketable skills with a disadvantage both to themselves and to the social and economic structure of society. One of the fundamental problems that confronts planners in occupational education is that of restructuring the school system to maximize the holding power of the school in order to ensure that each individual leaves school with a salable skill.

Let us now examine more closely the occupational structure or work system of the model for education for occupational proficiency. Two essential elements are provided in the system. One relates to the mission of the total system to provide each individual, in light of his attribute system, with the opportunity for employment at a level of optimum advantage to himself and to society. The second relates to the continuous process by which the individual may be recycled from the labor force to the school system so that he can receive training essential for employment at the optimum level of his capacity. To function effectively, therefore, the system must provide for the possibility and opportunity for individuals to leave the school system, enter the labor force, and reenter the school system on either a full-time or part-time basis. We have indicated through our flow lines that reentry may be either at the upper grades or at the postsecondary or adult programs. Again, the principles to be applied are that no educational program is terminal, nor is any decision to leave the system irrevocable.

We have introduced into this model a somewhat complicated decision box which suggests that under ideal and optimum conditions, consistent with practice and the changing attributes of both the individual and the occupational demand system, the individual may consciously or subconsciously test his employment for its quality of optimality. If the individual decides at any point in time that he is functioning at an optimum level of satisfaction to himself, then this decision is denoted by "yes" and is reflected in the flow line back to work. The individual, hence, has questioned his status, decided it is satisfactory, and continued in his present place of employment. If the answer is "no," that is, the individual is not working at optimum level of performance or satisfaction, then he has a number of alternatives. He may continue at his job, even though it is not optimum, he may obtain a different job, or he may decide to leave work entirely and immediately recycle himself into the school system. Another alternative is to continue in work but to reenter the school system on a part-time basis to get additional training which may lead to reentrance into the labor market, or to recycle through the optimum decision block. All of these alternatives are connoted by the "no" routes from the decision block.

The model for education for occupational proficiency makes explicit three elements which are essential to optimizing employment. These elements are set into the model to encompass both the school system and the occupational structure or work system. The first is the changing attributes of the individual, leading to career decision and progression, and manifested as the individual information system. This element is shown as an input into both the school and the work systems to denote that attributes are constantly modified, decisions are made at diverse points in time, and the individual is acting on his own in relation to the decision points to continue education, enter into employment, or recycle through the school system. This element is the point of primary concern of the occupational counseling and guidance subsystem in the school which must function effectively if the goal of optimum employment is to be realized.

The second element is labeled "curriculums based on occupational information and societal demands modified by the individual attribute system." This element is embedded into the school system, but it derives its content from the occupational structure. The flow diagram, therefore, illustrates this element as emerging from the occupational structure and acting as an input into the school system. Curricular experiences are considered modular and are constructed to facilitate the attainment of specific behavioral objectives at any given point in time in light of the individual's goal system and consistent with his attributes and the occupational demands of society. If we hold the position that the dichotomy between general or academic programs and vocational technical, or occupational education programs must be obliterated, then our basic concerns are (1) that the curricular experiences are appropriate in terms of eventually maximizing or optimizing the potential for employment of the individual and (2) that they must provide for the desired combination of basic skills, scientific and technical training, development of attitudes and habits, provisions for decision-making, and prerequisites for occupational preparation in higher and postsecondary institutions. The construction of curricular modules and the introduction of these modules into the school system are the responsibility of curriculum developers in occupational education.

This responsibility is assigned to occupational education because of the expertise required for effective development of these modules; it does not connote a dichotomy between the educational objectives related to preparing persons for employment and other educational objectives. Divisiveness in the school system is a luxury which cannot be tolerated if the national goals outlined earlier in this paper are to be realized.

The third element in the model is the changing attributes of occupational demand structure which includes the occupational information subsystem. This element is derived from the occupational structure and work system and implemented by the school system. Specifically, it routes the dynamic characteristics of the world of work and the constant changes that are taking place in the structure of occupations directly into the school system. In terms of the curriculum problem, the changing attributes of occupational demand structure dictate that new curriculums must constantly be developed and inserted into the school system if the school system is to be an effective agent in preparation of individuals for the contemporary world of work.

The model with its accompanying philosophical framework which has just been presented may provide a structure for discussing occupational education. We admit that the model is presently incomplete; however, it does provide a structure from which more sophisticated models may be developed and a vehicle for discussing the nature of the evaluation processes that might be applied to occupational education. (For a more detailed treatment of the occupational proficiency model refer to "The Curriculum Problem and National Goals," Coster, Morgan and Dane, 1969.)

The next section of this paper will present a generalized model of educational evaluation and describe the interface between the occupational proficiency model and the evaluation model.

A General Educational System Evaluation Model

Light and Smith[10] have credited current evaluation methods with possessing far greater power in detecting failure than inspiring success. The literature is replete with examples of programs that have failed (e.g., Jensen, Coleman, Westinghouse[11]). It is our contention that while many programs may have failed in some absolute sense, current evaluation models have also failed since only a few cases have been cited which indicate that programs have been changed for the better as a result of the evaluation process. The current view of evaluation assumes a static model in which some external source monitors a system at discrete time periods (usually after the program is completed) and imposes arbitrary criteria in order to determine if a program is successful, based on mean scores of the various functional subsystems. The current approaches to evaluation may be described as being product-oriented, stressing what is produced rather than how it is produced. This approach is not suited for program development and improvement.[12]

Evaluation practices of regional accrediting agencies, however, are dynamic. The regional associations have long been concerned with upgrading education programs, and they have employed a feedback system to inform participating agencies about the strengths and weakness of their enterprises as well as to recommend alternatives for improvement. This dynamic approach can lead to program improvement as well as provide information that can be used by program developers to increase their probabilities of success. However, there are weaknesses in the evaluation approach of the regional associations. Some of these weaknesses are: (1) relationships between process and product are assumed to exist despite little empirical evidence that such relationships do exist; (2) process evaluation is stressed to the virtual exclusion of product evaluation; and (3) no external criteria are applied to determine the relative performance of educational systems. These weaknesses do not preclude the regional associations from upgrading an educational system; but only limit confidence in the utility of the evaluations due to the subjective approach.

The model to be presented can be viewed as a combination of the two approaches to educational evaluation. The model will have the objective monitoring properties of the current evaluation approaches, as well as the dynamic properties of the regional association approach.

The Model for Educational Planning and Evaluation

Let us turn now to consideration of a basic structural model for educational planning and evaluation which will be useful not only to accrediting agencies, but also to education administrators as well. The model is shown in Figure 2. The first element in the model is the attribute system of the individual, his needs, interests, and abilities. The second element is the needs of society. From these twin sources, mission statements can be formulated which specify the ultimate purpose of the educational system. In American public education mission statements based on individual attributes and societal needs have often been legislatively formulated.

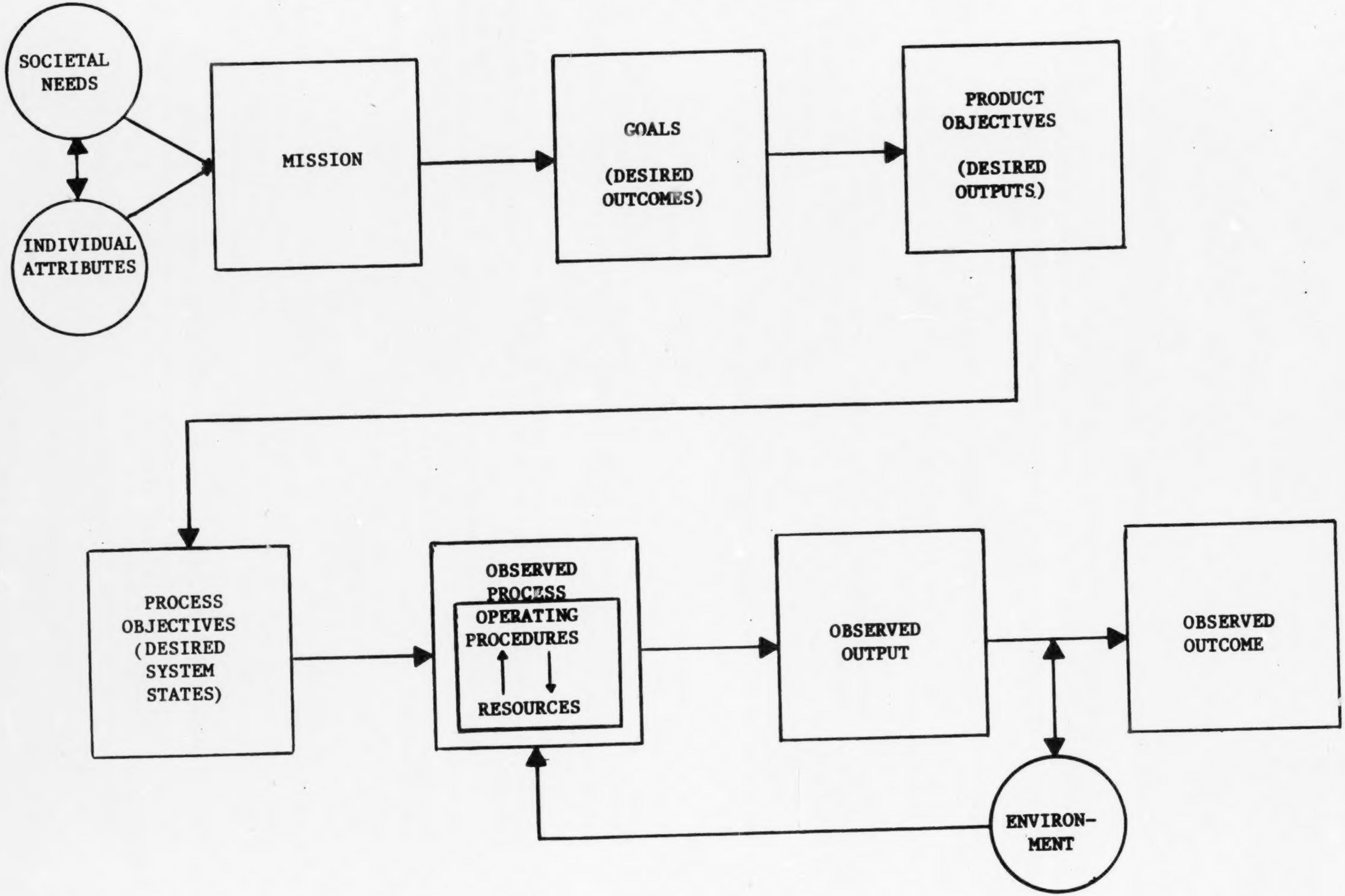
The mission statement defines the functional nature of the education system and any change in the statement requires that a new system be developed, or changes be made in the old system. For any system, the mission statement is assumed to be fixed at any point in time, even though it may change at some future time.

Given a mission statement, specific goals may be formulated which are a "best estimate" of the mothods by which the mission may be accomplished. Given these goals, product objectives may be formulated which are a "best estimate" of the concrete entities that are necessary in order to fulfill the goals. Given product objectives, process objectives may be defined which describe the system states that are necessary in order that concrete entities are produced. The sequence from mission to product objective can be conceptualized as moving from diffuse to specific and from abstract to concrete.

A familiar example might aid in distinguishing between the mission goals, product objectives and process objectives. Suppose a mission statement were "A man will be sent to the moon in 1970." The goals may be exhaustively defined as: a rocket capable of carrying a man must (1) lift off of the earth's surface 30 feet, (2) fly between 30 feet from the earth and the moon's surface, and (3) land on the moon's surface during 1970. Goals are arbitrarily defined in terms of estimated functional importance and, in this case, serially. After the goals are defined, product objectives are defined. For Goal 1, a product objective might be "a rocket engine capable of generating 50 million ft./lbs. of thrust must be developed by 1969." A process objective for the product objective might

FIGURE 2

STATIC STRUCTURAL MODEL OF EDUCATIONAL EVALUATION


SOCIETAL NEEDS
INDIVIDUAL ATTRIBUTES
MISSION
GOALS
(DESIRED OUTCOMES)
PRODUCT OBJECTIVES
(DESIRED OUTPUTS)
PROCESS OBJECTIVES (DESIRED SYSTEM STATES)
OBSERVED PROCESS
OPERATING PROCEDURES
RESOURCES
OBSERVED OUTPUT
OBSERVED OUTCOME
ENVIRON-MENT

be: "a study must be conducted to examine the relative properties of liquid and solid fuel systems." In the example, it is readily apparent that each step from process to goal must be accomplished before the mission can be fulfilled. The process objectives are desired system states; the product objectives are desired outputs, and the goals are desired outcomes which result from the interaction of the outputs with the environment. The possibility should be noted that one may fulfill all product objectives and not reach the goal, or all process objectives and not fulfill the product objective. In the case of the latter, one can simply change the process if product objectives are not met, but in the case of the former, one must examine both the output and the environment prior to deciding which corrective course one must take.

The structural elements of the model are depicted in Figure 2. They are:

(1) The value structure of a given society, including the social, economic, and political structure in which educational programs are developed and implemented.

(2) The clientele and the attributes of the clientele for which programs are designed.

(3) The mission of the program, which is a manifestation of the combined mix of the value structure of society and the attributes of the individual.

(4) The goals of the program--the desired outcomes.

(5) The product objectives--the desired outputs.

(6) The process objectives--the desired system states.

(7) The observed processes--the system states.

a. The operational procedures--the method, techniques, emphases, and efforts utilized to attain the product objectives.

b. The resources--both material (including facilities, equipment and material) and human (including teaching, administrative, supervisory, service and special staff)--utilized to attain the product objectives.

(8) The observed output--defined in terms of statements in the product objective.

(9) The observed outcomes--defined in terms of the goals statement.

(10) The environment--those forces which may impinge on the outputs and processes to alter outcomes.

The static structural model may be employed at any level. It can be used to evaluate the efficiency of a single program of instruction or a program at the local, state, or national level. System efficiency may be defined in terms of the degree to which the observed outcomes, outputs, and procedures are in juxtaposition with the desired outcomes, outputs, and procedures. The structural model is a formalization of the current approaches to evaluation if one stresses output to the virtual exclusion of process and outcome. In this model, once set, goals, product objectives, and process objectives are fixed. This model may be used to monitor systems at discrete time intervals.

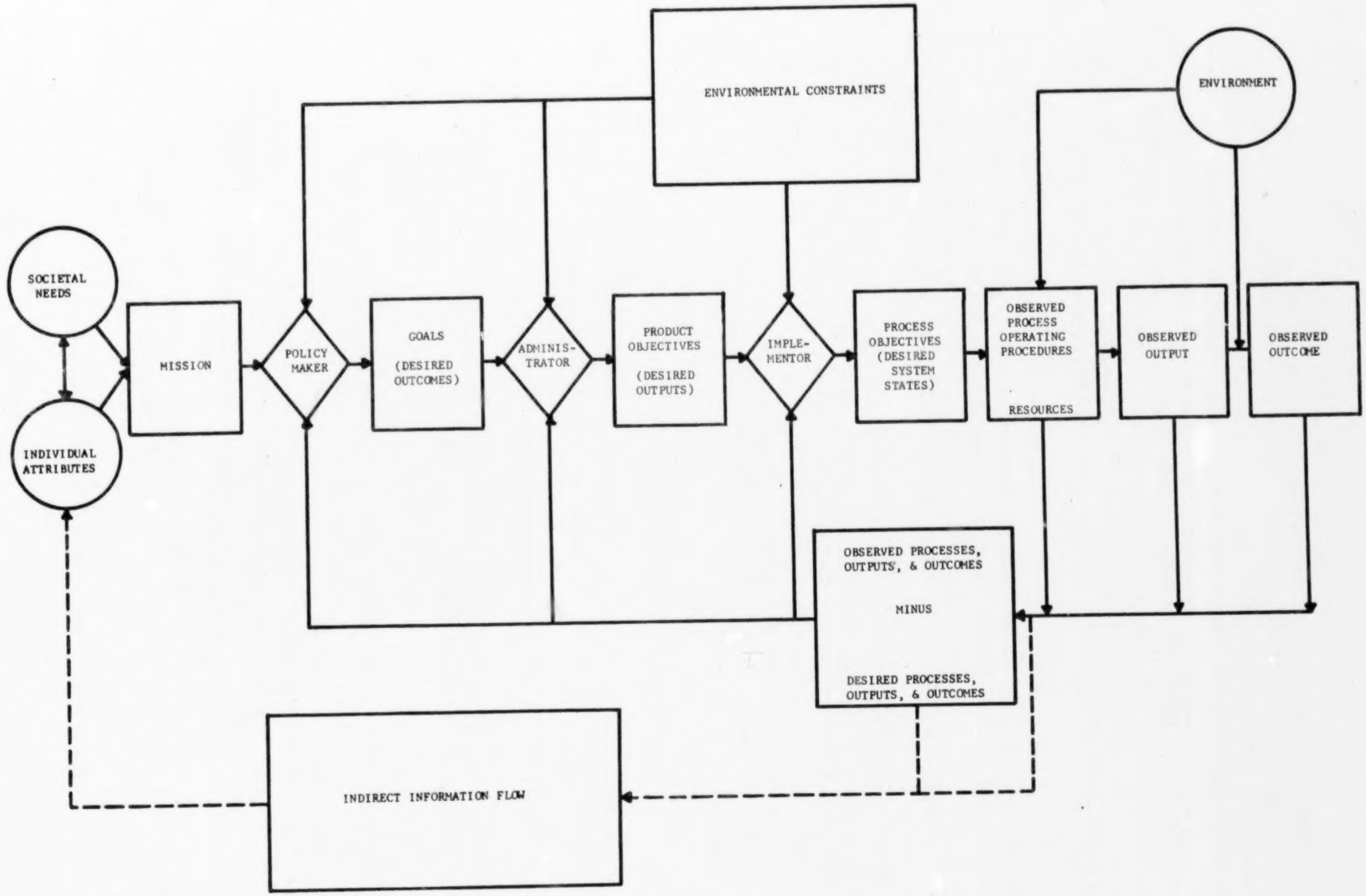

SOCIETAL NEEDS
INDIVIDUAL ATTRIBUTES
MISSION
POLICY MAKER
GOALS (DESIRED OUTCOMES)
ADMINIS-TRATOR
PRODUCT OBJECTIVES (DESIRED OUTPUTS)
ENVIRONMENTAL CONSTRAINTS
IMPLE-MENTOR
PROCESS OBJECTIVES (DESIRED SYSTEM STATES)
ENVIRONMENT
OBSERVED PROCESS OPERATING PROCEDURES
RESOURCES
OBSERVED OUTPUT
OBSERVED OUTCOME
OBSERVED PROCESSES, OUTPUTS, & OUTCOMES
MINUS
DESIRED PROCESSES, OUTPUTS, & OUTCOMES
INDIRECT INFORMATION FLOW

FIGURE 3

A GENERAL EDUCATIONAL SYSTEM EVALUATION MODEL

The General Educational System Evaluation Model (See Figure 3) has as its structural base the elements of the static structural model. It may be noted that the model has decision-maker inserts between the mission and goals, between the goals and product objectives, and between the product objectives and the process objectives. The first decision-maker is the policy-maker, who is usually at the highest level on an administrative chart. He translates the mission into goals. The second decision-maker is the administrator, usually at a lower level of management. He translates the goals into product objectives. The final decision-maker is the implementor who translates the product objectives into process objectives. He is usually at an even lower level of management. Feedback loops from the output process and outcome evaluation have been shown to each decision-maker. (In small local education agencies or schools this might be one person.) After the first evaluation, the policy-maker decides in light of the evaluation data and the mission statement whether his goals are reasonable. If the goals are not reasonable, then they should be changed. After the policy-maker has adjusted the goals, the administrator must then examine his product objectives in terms of their potential for fulfilling the adjusted goals, in light of the evaluation data. If the product objectives are not reasonable, they should be altered. After the administrator has adjusted the product objectives, the implementor must examine process objectives in terms of the evaluation data and product objectives. The process of examination and reexamination of goals, product objectives, and process objectives is viewed as a continuous process. Only through constant and diligent effort can we expect to improve the quality of education in America. It must be noted once again that this general model performs the same functions as previous approaches, as well as providing for the interface of programs within any given level.

Before turning to the discussion of the interface between the models which have been presented, several comments about evaluation are in order. First, evaluation is defined as the comparison between the processes, outputs, and outcomes which are desired and those which are actually observed. Therefore, if the desired conditions and the observed conditions are equal, the system, by definition, is performing optimally.

Second, to this point, only internal evaluation has been discussed. However, the system may be externally evaluated, assuming that at a point in time the mission goals, product objectives, and process objectives are fixed. Results of external evaluation should feed back to the decision-makers along with recommendations for improvement.

The Interface Between the Occupational Proficiency and General Evaluation Models

The occupational proficiency model provides the philosophical background and the conceptual framework for an idealized occupational education system. The general evaluation model provides the conceptual framework for the evaluation and upgrading of an educational system. Therefore, we will generally describe how this idealized system might be developed, implemented, evaluated, and upgraded by defining the elements of the general evaluation model in terms of the occupational proficiency model. Since the level of the system to be evaluated will not be defined, only general classifications will be discussed.

The mission of occupational education is: to provide each individual with the opportunity for employment at a level of optimum advantage to himself and to society, in light of the attribute system of the individual. The goals of occupational education are related to work performance in the labor market. The product objectives are related to those skills and attitudes possessed by persons just prior to leaving the education system and the process objectives are those intervening activities undertaken by the occupational education system aimed at satisfying the product objectives. The environmental constraints of the decisions-makers are present at all levels. The most common environmental constraint is funds. For the policy-maker, two major constraints are manpower availability and labor market demands. For the administrator, a major constraint is the measurement technology available to measure output. For the implementor, the availability of personnel and facilities, even given enough funds, is a major constraint. Many other constraints will be present; hence, the decision-makers must define the constraints under which they are working.

Once the desired properties of the system have been stated, the development of the system is temporarily complete. This phase must be reexamined upon completion of each evaluation.

The implementation of the system simply consists of operationalizing the process objectives. Of course, there will be some slippage due to both random system error (e.g., unclear process objectives) and systematic system error (e.g., attitudes of personnel about process objectives, or prior experiences). One responsibility of the implementation phase is to minimize the occurrence of error. When the operation of the system begins, the implementation phase is temporarily completed.

The evaluation phase consists of gathering data in terms of the stated goals, product objectives and process objectives. Then, a comparison must be made between the desired and observed states.

Evaluation of the total system may be undertaken externally by imposing another value system on the results of the internal evaluation, by imposing criterion levels. The information then must be fed back to the policy-maker, administrator, and implementor, and the upgrading-redevelopment phase begins. Adjustments are made to the goals, product objectives, and process objectives in light of the data, the next higher level of control statement, and environmental constraints.

This system continually cycles, environmental constraints constantly change, and the system is constantly improved based on evaluation information. By comparing those systems which have been externally evaluated as good with those evaluated as bad, one can isolate properties of the good systems that differentiate them from bad systems, thereby establishing casual chains which can be used to further upgrade the system. This, of course, assumes that comparable systems do exist.

If the holistic approach to occupational education is implemented in conjunction with the evaluation model which we propose, we believe that the mission of occupational education can be obtained. We do not contend that this paper presents the only approach to completing the mission, but we do contend that the mission must be accomplished.

Implications for Accreditation

It would be presumptuous for us to prescribe the role of accreditation agencies in their efforts to improve the quality and quantity of occupational education. By the very nature of their organizational structure and charter, these agencies define their own roles and the parameters of their operation. What we can do is to plead for an examination of the process of occupational education which includes attention to the efficacy of its product within the constraints of charter and resources. More to the point, we can plead that the accreditation agency insist that its member institutions attend to the total process of planning and evaluation.

There are, however, certain specific implications that can be drawn for accreditation based on the concepts and models presented herein which relate to the contribution of accreditation to the improvement of occupational education.

First, there is a fundamental premise in American education that each individual has a right to the best possible education commensurate with his specific attributes and realistic in terms of his aspirations. This premise has a number of implications when applied to occupational education. It implies that each student should be able to pursue an educational program which will enable him to be appraised of his occupational potentials in the light of his attributes. He should have the opportunity to explore the alternatives for careers open to him. He should have the opportunity to participate in a training program which will equip him for initial entry into the career of his choice. Finally, he should have access to additional training or re-training in order to improve his skills or prepare for a new occupation. Accreditation can improve occupational education by helping institutions to live up to this fundamental American ideal.

Second, accrediting agencies may help to improve occupational education by improving the climate (environment) for occupational education. There are two dimensions of the climate for occupational education. One dimension is external to the local school system; the other is internal. Externally, the climate is conditioned by national goals which relate to minimizing unemployment and underemployment. At another level it is influenced by state and local goals, encompassing the policies of state and local boards of education which specify the importance of preparing persons for employment and encourage school systems to develop comprehensive occupational education programs. Finally, there is a climate of community opinion and attitude toward the significance of preparing people for occupational proficiency. This includes the combination of social, economic, and political factors which impinge directly and indirectly upon the development and implementation of adequate curricular offerings leading to the preparation for employment.

Internally, the climate relates to the status of occupational education programs in the school system. This includes insuring that the total curriculum is work-related and work-oriented, insuring that adequate options and alternatives are provided in the curriculum, and insuring that there is a realistic guidance program available which is coordinated with the instructional program on one hand, and the abilities and expectations of individuals on the other.

Third, this paper has presented the process of planning and evaluation as a continuous, dynamic process. This process includes the establishment of goals, the specification of product and process objectives, the installation of the process, and the observance of output and outcomes in relation to objectives and goals, respectively. If the process is realistic, then the objectives will be based on contemporary manpower requirements and future projections as well as on the occupational needs of the individuals in the system. If the system is effective, then the output will approximate the objectives, and the outcomes will approximate the goals. Outcomes, by definition, are the result of the interaction of the output with the environment, and this interaction may militate against the effectiveness of the total program. Thus, goals, objectives, and process may need to be adjusted constantly for maximum effectiveness. In the final analysis, the effectiveness of the program is contingent upon the employability of the product of the system. The accreditation agency has the responsibility to communicate to its membership the prerequisites for continued excellence, including the factors and conditions that distinguish between adequate and inadequate programs.

Constraints of time and resources may not permit a detailed examination of each institution's planning and evaluation process. For this reason, the accreditation agency may be thought of as having a monitoring function to insure that the process is adequate for the task. Hence, the entire planning and evaluation process should be examined during the course of accreditation, as well as the evidence the institution is willing to accept that its goals and objectives are attained.

In the real world, environmental constraints militate against the breadth and effectiveness of programs of occupational education, thereby reducing the probability that the individual will be prepared for an appropriate and reasonable career. The environmental constraints relate broadly to the extent to which the community is willing to commit its resources to preparing its members for employment. Hence, it seems reasonable to assume that the accreditation process should examine the environmental constraints as part of the process of evaluation and accreditation.

Finally, the process of evaluation, including accreditation, must be viewed as a dynamic process, which is, like the process that it evaluates, subject to constant improvement. This means that the evaluation and accreditation process should be subject to external validation against standards required for proficiency in the labor force. The model which we have presented appears valid in the light of the national goals which exist today. As goals change, and as evaluation technology improves, we can expect changes in our evaluation strategies and changes in our approach to occupational education. Such is the nature of a dynamic world.

FOOTNOTES

[1] Report of the National Advisory Council for Vocational Education, Washington, D. C.: U. S. Government Printing Office, 1968.

[2] William K. Selden, *Accreditation*, New York: Harper and Brothers, 1960, p. 42.

[3] U. S. Congress, House, Committee on Education and Labor, *Vocational Education Amendments of 1968*, Washington, D. C.: U. S. Government Printing Office, 1968.

[4] U. S. Congress, Senate, Committee on Labor and Public Welfare, *Vocational Education Amendments of 1968*, Washington, D. C.: U. S. Government Printing Office, 1968.

[5] *Vocational Education Amendments of 1968*, Public Law 90-576, Part A, Sex. 101.

[6] U. S. Congress, House, Committee on Labor and Public Welfare, *op. cit.*, p. 3.

[7] U. S. Congress, Senate, Committee on Education and Public Welfare, *op. cit.*, p. 3.

[8] Panel of Consultants on Vocational Education, *Education for a Changing World of Work*, Washington, D. C.: U. S. Government Printing Office, 1963.

[9] U. S. Congress, Senate, Subcommittee on Education of the Committee on Labor and Public Welfare, *Notes and Working Papers Concerning the Administration of Programs Authorized Under Vocational Education Act of 1963, Public Law 88-210 as Amended*, Washington, D. C.: U. S. Government Printing Office, 1968. Parts of this report were later published as General Report of the Advisory Committee on Vocational Education, *Vocational Education: The Bridge Between Man and His Work*.

[10] Richard J. Light and Paul V. Smith, "Choosing a Future: Strategies for Designing and Evaluating New Programs," *Harvard Educational Review*, 40:1-29, 1970.

[11] *Ibid.*

[12] *Ibid.*